

Richard Heimann (CA State Bar # 063607)
Nimish R. Desai (CA State Bar # 244953)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery St., 29th Fl
San Francisco, CA 94111-3339
Telephone: 415-956-1000
Facsimile: 415-956-1008
rheimann@lchb.com
ndesai@lchb.com

David S. Stellings (*pro hac vice*)
Katherine I. McBride (*pro hac vice*)
Jessica A. Moldovan (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: 212.355.9500
Facsimile: 212.355.9592
dstellings@lchb.com
kmcbride@lchb.com
jmoldovan@lchb.com

Attorneys for Plaintiffs

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

James Milstead, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC, et al.,

Defendant.

Case No. 4:21-cv-06338-JST

**THIRD AMENDED CLASS ACTION
COMPLAINT**

JURY TRIAL DEMANDED

TABLE OF CONTENTS

		Page
1		
2		
3	I. INTRODUCTION	1
4	II. PARTIES	4
5	A. Plaintiffs	4
6	B. Defendants	6
7	III. JURISDICTION, VENUE, AND INTRADISTRICT ASSIGNMENT	7
8	IV. GENERAL FACTUAL ALLEGATIONS	8
9	A. SDMs are supposed to detect crashes and control airbags and seatbelts.	8
10	B. GM used a dangerous and defective SDM software calibration in its trucks	
11	and SUVs.	11
12	C. GM knew that the SDM Calibration Defect was dangerous and unjustified	
13	but has failed to warn or compensate consumers.	14
14	1. Old GM recklessly downplayed serious risks of injury when it	
15	chose to include the SDM Calibration Defect in the Class Vehicles.	16
16	2. GM's aggressive cutoff was not necessary to protect against "late"	
17	airbag deployments.	20
18	3. GM knew about a pattern of suspicious accidents involving the	
19	SDM Calibration Defect in the Class Vehicles.	22
20	a. GM has litigated (and settled) many personal injury lawsuits	
21	for suspicious airbag failures in the Class Vehicles.	23
22	b. GM knew or should have known about hundreds of publicly	
23	reported airbag failures in the Class Vehicles.	32
24	D. Despite its knowledge, GM misrepresented and concealed important	
25	information about the SDM Calibration Defect and Class Vehicle safety.	50
26	1. Labels and window stickers on the Class Vehicles stated that they	
27	were equipped with working airbags and seatbelts and failed to	
28	disclose the SDM Calibration Defect.	51
	2. GM published owners' manuals for the Class Vehicles that detailed	
	their safety features but did not disclose the SDM Calibration	
	Defect.	54
	3. GM marketed the Class Vehicles to be safe and reliable but failed	
	to mention the SDM Calibration Defect.	58
	4. GM provided warranties to repair defects in the Class Vehicles and	
	have not done so.	61
	V. CLASS ACTION ALLEGATIONS	62
	A. The Class Definition	62
	B. Numerosity: Federal Rule of Civil Procedure 23(a)(1).	63
	C. Commonality and Predominance: Federal Rule of Civil Procedure 23(a)(2)	
	and 23(b)(3).	64
	D. Typicality: Federal Rule of Civil Procedure 23(a)(3).	65
	E. Adequacy: Federal Rule of Civil Procedure 23(a)(4).	65

TABLE OF CONTENTS
(continued)

	Page
F. Declaratory and Injunctive Relief: Federal Rule of Civil Procedure 23(b)(2).....	65
G. Superiority: Federal Rule of Civil Procedure 23(b)(3)	66
VI. ANY APPLICABLE STATUTES OF LIMITATION ARE TOLLED.....	66
VII. CAUSES OF ACTION	68
VIII. PRAYER FOR RELIEF.....	79
IX. DEMAND FOR JURY TRIAL.....	80

1 Plaintiffs, individually and on behalf of all others similarly situated (the “Class”), allege
 2 the following against General Motors LLC, General Motors Holdings LLC, and General Motors
 3 Company (collectively, “Defendants,” “GM,” or “New GM”) based, where applicable, on
 4 personal knowledge, information and belief, and the investigation of counsel and their experts.
 5 Plaintiffs file this complaint pursuant to the Court’s Order granting leave (Dkt. 196 at 19) and
 6 attach hereto as Exhibit E a redline comparison between this complaint and the previous pleading
 7 for the Court’s reference.

8 **I. INTRODUCTION**

9 1. This case involves a dangerous defect that compromises critical safety systems in
 10 millions of GM trucks and SUVs. When working properly, during a frontal crash of sufficient
 11 severity, a vehicle’s seatbelts should tighten to hold the vehicle occupants in place, and the
 12 airbags should inflate to protect them from hard impacts. A defect in the Class Vehicles, however,
 13 can prevent seatbelt tightening and airbag deployment during certain types of crashes, leaving
 14 vehicle occupants without protection exactly when they need it most.¹

15 2. The defect is contained in the software that governs the Class Vehicles’ airbag
 16 control unit. This unit, also known as the Sending and Diagnostic Module (“SDM”), is a small
 17 computer connected to sensors placed throughout a vehicle. These sensors monitor vehicle
 18 performance and tell the SDM when they detect irregular behavior.

19 3. Based on the signals it receives from these sensors, the SDM *should* fire the
 20 airbags and tighten seatbelts when needed in a real-world crash of sufficient severity. But in the
 21 Class Vehicles, the software program that controls the SDM is calibrated in such a way that it
 22 prematurely prevents airbag and seatbelt deployment, long before any reasonable or acceptable
 23 time to do so. This has serious repercussions in foreseeable, real-world accidents that need
 24 seatbelt and airbag deployment after the software cuts off access to those features—such as
 25 accidents that involve multiple impacts, or that start with a soft initial onset and then increase in
 26

27 ¹ The “Class Vehicles” include all vehicles in the United States that contain the SDM Calibration
 28 Defect that were (1) manufactured, sold, distributed, or leased by Defendants or (2)
 manufactured, sold, distributed, or leased by General Motors Corporation (“Old GM”) and
 purchased or leased by Plaintiffs or a Class member after July 10, 2009.

1 severity over time. In such accidents, the airbags and seatbelts in the Class Vehicles can fail. Put
2 simply, because of a persistent, dangerous insistence within the company's Trucks Group, GM
3 used a software calibration that can and does prematurely close the time window to engage
4 airbags and seatbelts in a crash, putting occupants of the Class Vehicles at serious risk.

5 4. Old GM knew about the effect of this calibration and related dangers from the very
6 outset, when it originally decided to prematurely close the time window for airbag deployment in
7 the Class Vehicles in the late 1990s.² In the process, Old GM overrode serious concerns from a
8 team from Delco Electronics (later called Delphi Electronics, now known as Aptiv), including
9 engineering manager, Chris Caruso. Mr. Caruso and a team of software engineers from Delco—
10 which designed the base SDM software program used in the Class Vehicles and other GM
11 vehicles—expressly warned Old GM in or about 1999 that using its strategy to prematurely cut
12 off the potential for airbag and seatbelt deployment during a crash event was a reckless and
13 dangerous design decision.

14 5. Old GM's Trucks Group, which was in charge of the design and development for
15 all GM trucks and SUVs, ignored this warning and insisted on using its defective SDM
16 calibration strategy. Given their significant concerns, Mr. Caruso and the Delco team insisted that
17 Old GM sign a disclaimer of Delco's liability for the modified algorithm as used in GM trucks
18 and SUVs.

19 6. Tellingly, a separate team in charge of the design and development for GM cars
20 rejected GM Trucks' approach after hearing (and heeding) the Delco team's concerns about the
21 earlier cutoff. As such, GM cars included a much longer window (fully twice as long as the
22 window used by GM Trucks, approximately 100 milliseconds at minimum) for the airbags and
23 seatbelts to deploy in a crash for the vehicles they designed. As such, not only did GM Trucks
24 reject the warnings from Mr. Caruso and the Delco team, it also ignored its own cars group's
25 views, which included a time window that more reasonably and appropriately tracks the duration
26 of crash events in the real world, as opposed to the laboratory crash test environment.

27
28 ² As detailed further below, Old GM filed for bankruptcy in 2009, which led to the creation of the
contemporary GM entities named as Defendants herein.

7. On information and belief, starting in or about 1999, GM Trucks Group (and Old GM before it) used its defective approach to SDM software calibration in all of the trucks and SUVs (mid and large size vehicles) under its direction, and continued to use its dangerous and defective approach to prematurely cut off airbag and seatbelt deployment during crashes at least through model year 2018. Plaintiffs refer to this defective strategy—to calibrate software to prevent airbag and seatbelt deployment during a “dead zone” that begins too soon after a crash has begun, and well before the safer window used by GM cars (a minimum of approximately 100 milliseconds after a crash has begun)—as the “SDM Calibration Defect.”

8. When General Motors, LLC (“GM LLC”) was formed in 2009, it acquired books, records, and personnel from Old GM that reflected this reckless decision to use the dangerous SDM calibration in GM trucks and SUVs. Despite this acquired knowledge, GM continued to use Delco SDMs in its vehicles and, on information and belief, continued to use the defective software calibration associated with those Delco SDMs as well.

9. Since it was formed in 2009, GM has gained still more knowledge of the defect through personal injury lawsuits, consumer complaints, and its own investigations into serious crashes where the airbags and seatbelts failed in the Class Vehicles. As an example, documents in a personal injury lawsuit filed against GM LLC in 2011 describe the SDM Calibration Defect in detail and relate Old GM’s reckless decision to use it. *See* § IV.C.3.a, *infra*. Chris Caruso, the engineer who originally objected to the defective deployment strategy in the first instance, has gone on to serve as an expert in a number of these cases.

10. While the use of the defective shutoff strategy began some twenty years ago, it remains a real and immediate risk to Plaintiffs and Class members today. Indeed—and while personal injury settlements are not uniformly made public (such that the records available to Plaintiffs only reflect those publicly disclosed)—court records show that GM settled yet another personal injury lawsuit about the SDM Calibration Defect in December 2022.

11. Discovery in that case, *McCoy v. General Motors*, revealed that GM persisted in using its dangerous, early cutoff strategy in a model year 2018 GM SUV. Mr. Caruso’s report in *McCoy* provides direct evidence that, after first insisting on its defective deployment cutoff

1 strategy in approximately 1999, for many years (decades) thereafter up to 2018, GM Trucks
 2 failed to adopt a safer and more rational design that would allow for deployment for at least as
 3 long as the window used by GM cars (*i.e.*, approximately 100 milliseconds at a minimum). *See*
 4 § IV.C.3.a, *infra*. To the contrary, in both 1999 and 2018, GM’s trucks and SUVs dangerously cut
 5 off the deployment window far short of that minimum.

6 12. Finally, publicly available consumer complaints to the National Highway Traffic
 7 and Safety Administration (“NHTSA”) detail more than ***eight hundred*** instances where the
 8 airbags and/or seatbelts suspiciously failed in the Class Vehicles during frontal crashes. Many of
 9 these reports specifically state that GM knew about and investigated the crash after the reported
 10 airbag failures. A separate NHTSA dataset indicates that, from 1999 to 2021, at least 1,298
 11 people were killed or injured in a frontal collision in which the airbags did not deploy in one of
 12 these vehicles. *See* IV.C.3.b, *infra*.

13 13. Despite its knowledge of the SDM Calibration Defect and its impact on safety,
 14 GM has concealed the defect and failed to recall or repair the Class Vehicles, and has thereby
 15 avoided the significant costs, inconveniences, and reputational harms of recalling millions of
 16 trucks and SUVs. GM has hidden the defect despite its obligation to disclose it, misrepresented
 17 the Class Vehicles to be safe, and continued to sell them to consumers.

18 14. Because of GM’s failure to disclose the truth, consumers continue to purchase and
 19 drive Class Vehicles with the SDM Calibration Defect every day—on road trips, commutes, and
 20 weekend errands alike—unaware that their airbags and seatbelts may not work in certain serious
 21 crashes when they need them. This lawsuit seeks redress from GM for the damages incurred
 22 when Plaintiffs and proposed Class members paid for vehicles with a safety system that may fail
 23 them in life-threatening collisions.

24 **II. PARTIES**

25 **A. Plaintiffs**

26 15. Plaintiff James Milstead (“Plaintiff” for the purposes of this paragraph) is an
 27 individual residing in Oxnard, CA. On September 11, 2021, Plaintiff purchased a 2012 Avalanche
 28 (for purposes of Plaintiff’s allegations, the “Class Vehicle”) from Escondido Auto Super Center

1 in Escondido, CA. On information and belief for the reasons set forth herein, GM installed the
 2 SDM Calibration Defect—which shut off the vehicle’s ability to deploy airbags in a crash
 3 prematurely—in Mr. Milstead’s truck during the manufacturing process, and Mr. Milstead’s truck
 4 contained the SDM Calibration Defect at the time he purchased the vehicle. At the time of
 5 purchase, Plaintiff reasonably expected that the airbags and seatbelts would function in the event
 6 of a crash and had no way of knowing that it contained a dangerous and defective SDM
 7 calibration that could cause the airbags and seatbelts to fail when needed during a crash. To the
 8 contrary, before acquiring the vehicle, Plaintiff viewed or heard commercials and reviews through
 9 television, radio, and the internet that touted the safety and reliability of Plaintiff’s vehicle and
 10 GM vehicles generally. GM concealed the existence of the defective SDM calibration from
 11 consumers including Plaintiff. Plaintiff would not have purchased the Class Vehicle, or would
 12 have paid less for it, if Defendants did not conceal material information about the defective SDM
 13 calibration.

14 16. Plaintiff Arthur Ray (“Plaintiff” for the purposes of this paragraph) is an individual
 15 residing in Brentwood, California. In or around January 22, 2010, Plaintiff purchased a new 2010
 16 GMC Sierra 2500 (for purposes of Plaintiff’s allegations, the “Class Vehicle”) from Concord
 17 GMC, an authorized dealership located in Concord, California. On information and belief for the
 18 reasons set forth herein, GM installed the SDM Calibration Defect—which shut off the vehicle’s
 19 ability to deploy airbags in a crash prematurely—in Mr. Ray’s truck during the manufacturing
 20 process, and Mr. Ray’s truck contained the SDM Calibration Defect at the time he purchased the
 21 vehicle. At the time of purchase, Plaintiff reasonably expected that the vehicle’s airbags and
 22 seatbelts would function in the event of a crash and had no way of knowing that it contained a
 23 dangerous and defective SDM calibration that could cause the airbags and seatbelts to fail when
 24 needed during a crash. To the contrary, before acquiring the Vehicle, Plaintiff viewed or heard
 25 commercials and reviews through television and the internet that touted the safety and reliability
 26 of Plaintiff’s vehicle, including its “Five Star” safety rating, and GM vehicles generally. GM
 27 concealed the existence of the defective SDM calibration from consumers including Plaintiff.
 28

1 Plaintiff would not have purchased the Class Vehicle, or would have paid less for it, if
 2 Defendants did not conceal material information about the defective SDM calibration.

3 17. Plaintiff Richard Vargas (“Plaintiff” for the purposes of this paragraph) is an
 4 individual residing in Menifee, California. In or around December 2012, Plaintiff purchased a
 5 new 2012 Chevrolet Suburban (for purposes of Plaintiff’s allegations, the “Class Vehicle”) from
 6 El Camino Real Chevrolet dealership located in Monterey Park, California. On information and
 7 belief for the reasons set forth herein, GM installed the SDM Calibration Defect—which shut off
 8 the vehicle’s ability to deploy airbags in a crash prematurely—in Mr. Vargas’ SUV during the
 9 manufacturing process, and Mr. Vargas’ SUV contained the SDM Calibration Defect at the time
 10 he purchased the vehicle. At the time of purchase, Plaintiff reasonably expected that the Vehicles’
 11 airbags and seatbelts would function in the event of a crash and had no way of knowing that it
 12 contained a dangerous and defective SDM calibration that could cause the airbags and seatbelts to
 13 fail when needed during a crash. To the contrary, before acquiring the Vehicle, Plaintiff viewed
 14 or heard commercials and reviews through television, radio, and the internet that touted the safety
 15 and reliability of Plaintiff’s vehicle, including its “Five Star” safety rating, and GM vehicles
 16 generally. Additionally, when at the dealership before making his purchase, Plaintiff inquired
 17 about the airbags in the Class Vehicle. GM concealed the existence of the defective SDM
 18 calibration from consumers including Plaintiff. Plaintiff would not have purchased the Class
 19 Vehicle, or would have paid less for it, if Defendants did not conceal material information about
 20 the defective SDM calibration.

21 **B. Defendants**

22 18. General Motors LLC (“GM LLC”) is a Delaware limited liability company with its
 23 principal place of business located at 300 Renaissance Center, Detroit, Michigan, and is a citizen
 24 of the States of Delaware and Michigan. The sole member and owner of GM LLC is General
 25 Motors Holdings LLC.

26 19. General Motors Holdings LLC (“GM Holdings”) is a Delaware limited liability
 27 company with its principal place of business in Detroit, Michigan, and is a citizen of the States of
 28

1 Delaware and Michigan. The sole member and owner of GM Holdings is General Motors
2 Company.

3 20. General Motors Company (“GM Parent”) is a Delaware corporation with its
4 principal place of business in Detroit, Michigan, and is a citizen of the States of Delaware and
5 Michigan. GM Parent’s only asset is its 100% ownership interest in GM Holdings. In public SEC
6 filings, GM Parent states: “We design, build and sell cars, trucks, crossovers and automobile parts
7 worldwide.” GM Parent sells vehicles throughout the United States “through [its] dealer network
8 to retail customers.” As further noted in SEC filings, GM Parent is also responsible for making
9 reports to NHTSA related to vehicle safety and making determinations as to vehicle recalls.³

10 21. Each of GM LLC, GM Holdings, and GM Parent operates out of GM’s Global
11 Headquarters in Detroit, Michigan.

12 22. In June 2009, Old GM filed for bankruptcy. Defendants were then created on or
13 about July 10, 2009, in connection with the sale of substantially all of Old GM’s assets pursuant
14 to a Master Sale and Purchase Agreement. As a result of the sale, GM LLC acquired substantially
15 all of Old GM’s books, records, and personnel. GM LLC then transferred some of these assets to
16 GM Holdings (formed shortly after the bankruptcy sale). Defendants thereby acquired from Old
17 GM the knowledge about the SDM Calibration Defect (defined below) that those books, records,
18 and personnel held. GM Parent and GM LLC also took responsibility for any necessary recalls of
19 Old GM vehicles going forward.

20 23. The causes of action in this Complaint are directed to GM Parent, GM Holdings,
21 and GM LLC and are based on their misconduct.

22 **III. JURISDICTION, VENUE, AND INTRADISTRICT ASSIGNMENT**

23 24. This Court has original jurisdiction over this action pursuant to the Class Action
24 Fairness Act (“CAFA”), 28 U.S.C. § 1332(d), because at least one Class member is of diverse
25 citizenship from one Defendant, there are more than 100 Class members, and the aggregate
26 amount in controversy exceeds \$5 million, exclusive of interest and costs.

27
28

³ See General Motors Company’s Form 10-K for fiscal year 2019.

25. This Court has personal jurisdiction over Defendants under California Code of Civil Procedure section 410.10.

26. Venue is proper in this District under 28 U.S.C. § 1391, and assignment is proper to this division under N.D. Cal. L.R. 3-2, because a substantial part of the events or omissions which give rise to the claims occurred in this District, and because Defendants have caused harm to Class members residing in this District, including Plaintiff Ray. GM conducts substantial business, including through numerous dealerships, and marketed, advertised, sold, and leased Class Vehicle in this District.

IV. GENERAL FACTUAL ALLEGATIONS

A. SDMs are supposed to detect crashes and control airbags and seatbelts.

27. Car crashes kill or seriously injure hundreds of thousands of people every year. Because of this risk, the federal government requires automobile manufacturers to include critical safety features—seatbelts and airbags—in all vehicles sold in the United States. This life-saving equipment has been mandatory in passenger vehicles since 1997. *See* 49 U.S.C. § 30127.

28. These features include seatbelt pretensioners, which tighten seatbelts to secure the occupants, and airbags, which are cushions that rapidly inflate from the steering wheel and other areas of the vehicle. During an accident, seatbelt pretensioners hold vehicle occupants in place, and airbags buffer or prevent impact between occupants and hard structures in the vehicle. Without the airbags, slamming into the hard structures (such as the steering wheel) during a crash can and has caused serious injuries and death.

29. When functioning properly, the combination of seatbelts and airbags is highly effective in reducing the safety risk in automobile collisions. NHTSA reports that the use of seatbelts and airbags reduces fatality risk by **61 percent** compared to an unbelted occupant in a vehicle without airbags.⁴ From 1987 to 2017, an estimated 50,457 lives were saved because frontal airbags deployed during a crash.⁵

⁴ U.S. Department of Transportation, NHTSA, *Fatalities in Frontal Crashes Despite Seat Belts and Airbags*, NHTSA Technical Report No. DOT HS 811 202 (September 2009).

⁵ NHTSA, Air Bags Overview. *Available at:* <https://www.nhtsa.gov/equipment/air-bags> (last visited July 27, 2023).

30. Although airbags work effectively to protect occupants when necessary, they are not meant to deploy with every impact. A crash may be of lower intensity (e.g., a low-speed fender bender in a parking lot) such that the seatbelt alone will be sufficient protection for the occupant.⁶ Airbags are designed to deploy in “moderate to severe” frontal or near-frontal crashes. A “moderate to severe” frontal crash is the equivalent of hitting a solid, fixed barrier at 8-14 miles per hour or higher.⁷

31. Seatbelt and airbag systems are known as “passive” safety systems because, when they are needed, they are supposed to operate automatically (meaning, the driver does not need to hit a button to deploy the airbag). They use sophisticated hardware components and software to activate and deploy the seatbelts and airbags systems automatically.

32. The “brain” behind this operation is the airbag control unit or “ACU” (also known as an Electronic Control Unit or “ECU”). GM refers to this component as the “Sensing and Diagnostic Module” or “SDM,” and that term is used throughout this Complaint. SDMs are effectively computers that control the car’s safety systems. They are intended, where appropriate, to issue a “command” to deploy airbags and tighten seatbelts to prevent or mitigate injury to vehicle occupants in a crash.

33. The SDM operates in three basic phases:

a. *First*, during regular vehicle operation, the SDM sits in a resting or “normal” mode. In this mode, the SDM constantly receives signals from sensors placed throughout the vehicle, which collect and report information on inputs such as acceleration, wheel speed, brake pressure, and impacts.⁸ The SDM monitors and interprets these signals to determine whether the vehicle is involved (or about to be involved) in a crash.

b. *Second*, while monitoring these signals in “normal” mode, if and when the SDM detects an irregular input that suggests a potential crash, it “wakes up” to search for further

⁶ Dr. Ching-Yao Chan, *Fundamentals of Crash Sensing in Automotive Airbag Systems*. Copyright Society of Automotive Engineers, (2000), at p. 50.

⁷ Air Bags Overview, *supra* note 5.

⁸ Clemson University Vehicular Electronics Laboratory, “Airbag Deployment Systems.” Available at: https://cecas.clemson.edu/cvel/auto/systems/airbag_deployment.html (last visited July 27, 2023).

confirmation of a crash (as opposed to, for example, an irregular input from slamming on the brakes and then avoiding a collision). In this second stage—known as “wake up” or “standby” mode—the SDM’s crash-sensing software algorithm is engaged to quickly decipher crash status and respond.⁹ After “wake up” mode is triggered by an irregular input, if additional inputs confirm a moderate to severe frontal crash, the SDM *should* issue a command to “fire” the airbag and/or tighten the seatbelts as needed.¹⁰

c. *Third*, the final phase in this sequence is the “reset” phase. From “wake up” mode, after it detects that a crash or a potential crash has fully completed, (i.e., that the vehicle has returned to normal operation after an irregular input) the SDM ultimately returns to its normal operating state through “resetting.”

34. A vehicle striking a pothole illustrates this three-phase sequence. The vehicle first operates with the SDM in “normal” mode as it drives down the road. Then, suddenly, the driver hits an unseen pothole. This jolt from hitting the pothole (and/or related inputs like deceleration) will trigger the SDM to enter “wake up” mode where it searches for more inputs. Awake, the SDM quickly asks: “How fast is the vehicle slowing down? Is the front bumper crushed? Is the vehicle speeding back up normally?” and reacting in turn.¹¹

35. If the SDM senses that the vehicle returns to normal operation and continues down the road, it will stop looking for confirmation of a crash and reset to normal operation. On the other hand, if, after it hits the pothole, the vehicle veers out of its lane and crashes into another vehicle head on, the SDM should detect this second input and fire the airbag.¹²

36. This entire sequence—from sensing an irregular signal (the pothole), to waking up and searching for confirmation of a crash, to firing the airbag where needed—might take only fractions of a second. For that reason, timing this sequence properly is critically important to

⁹ John Pearley Huffman, “The Physics of Airbags,” *Car & Driver*, June 14, 2011. Available at: <https://www.caranddriver.com/features/a15121591/the-physics-of-airbags-feature> (last visited July 27, 2023).

¹⁰ Jesse Kendall, P.E., and Kenneth Solomon, Ph.D., “Airbag Deployment Criteria” at p. 11. Available at: <https://www.experts.com/content/articles/Kenneth-Solomon-Airbag-Paper.pdf> (last visited July 27, 2023).

¹¹ Solomon, *supra* note 10, at p. 11.

¹² *Id.* at p. 8.

1 ensure that the seatbelts are tightened, and the airbags deploy, to protect the occupants when they
2 need to.

3 **B. GM used a dangerous and defective SDM software calibration in its trucks**
4 **and SUVs.**

5 37. Throughout the three-phase sequence described above, SDMs rely on software
6 algorithms to interpret signals, estimate crash dynamics, and issue a “deploy” or “do not deploy”
7 command to the safety systems.

8 38. For the SDM to function as intended, the software that controls it must be designed
9 to recognize and respond to real-world crashes so that the airbags inflate and seatbelts tighten
10 when they are needed.

11 39. Crash sensing occurs in “real-time.” This means that the sensing algorithm can
12 only examine a limited window of data to predict and judge the severity of crash events before
13 conclusion, so that the airbags can deploy and protect the occupant on impact.¹³ A decision to
14 “deploy” the airbags should occur when certain pre-set thresholds that tell the SDM a crash is
15 severe enough (i.e., a moderate to severe frontal collision) are met or exceeded. These
16 deployment thresholds are programmed into the SDM software through a process in which
17 engineers “calibrate” the software algorithm in the vehicle.

18 40. In the Class Vehicles, the software calibration that controls how and when the
19 SDM detects accidents and deploys the safety systems contains a serious defect. Specifically, for
20 frontal crashes, GM calibrated the SDM to prevent deployment during a dead zone. The dead
21 zone starts with a cutoff time imposed by GM after the SDM “wakes up.” At this early stage,
22 Plaintiffs note that time used and recorded by the SDM software (i.e. 45ms, 50ms, 100ms, etc.),
23 including the time elapsed for purposes of triggering the cutoff and resulting dead zone, is
24 complex. As a general matter, it refers to time as calculated in the software, as opposed to
25 traditional, linear time.

26 41. Putting aside whether any cutoff is necessary in light of advancements in modern
27 airbag technology, GM Trucks selected cutoff times that are reached too soon by any measure,
28

¹³ Chan, *supra* note 6, at p. 95.

1 i.e., cutoff times of less than approximately 100 milliseconds, which is a more realistic time
 2 period for crash sequences to progress, and the safer window used by GM cars.¹⁴ At the
 3 premature cutoff time used by GM Trucks, the algorithm increases the deployment thresholds to
 4 unattainable values, meaning that no matter how severe the inputs the SDM receives, the airbags
 5 and pretensioners will not deploy. Further, when the SDM clock is above the cutoff time, this
 6 dead zone does not end until SDM reset, and thus persists through foreseeable real world
 7 collisions. In sum, this defective design and premature cutoff—the SDM Calibration Defect—
 8 introduces a dead zone to a window where airbag deployment is often necessary in real-world
 9 crashes, but by design cannot happen.

10 42. Cutting off airbag deployment in the short duration GM Trucks used was callous
 11 and dangerous, particularly when compared to the time for a typical “crash duration” in a
 12 straightforward frontal, vehicle-to-barrier collision, which lasts for approximately 80-150
 13 milliseconds (0.08-0.15 seconds), much longer than the cutoff imposed by GM Trucks
 14 (approximately 50 milliseconds or less).¹⁵ And of course, more complex, multi-impact crashes
 15 may take even longer.

16 43. This defective calibration was no accident; rather, as detailed below, GM included
 17 it by design when it modified the SDM software program (originally known as ALGO-S) in the
 18 Class Vehicles to include it. In affirmatively and prematurely blocking these critical safety
 19 features while a crash is foreseeably still underway, GM greatly and needlessly increased the risk
 20 of injury and death in a variety of frontal crashes that require airbag deployment during the “dead
 21 zone.”

22 44. For example, this includes frontal crashes with multiple, distinct points of impact
 23 known as “concatenated” events. A vehicle that first hits a curb and then veers and hits a tree, or
 24 first hits a speed bump and then crashes into the vehicle in front of it, are examples of
 25 concatenated crashes. By their nature, concatenated accidents involve multiple discrete inputs for
 26 the SDM to detect during a crash sequence.

27
 28 ¹⁴ See ¶¶ 109-110 and Mr. Caruso’s *McCoy* report, *infra*.

¹⁵ Chan, *supra* note 6, at p. 169.

45. In concatenated crashes, the first part of the incident (hitting a curb) sends the SDM into its “wake up” or “stand by” mode. The initial curb hit does not trigger the airbag or tighten the seatbelt, but the SDM “wakes up” to confirm whether further irregular signals will follow and indicate a need for the seatbelts or airbags. In the Class Vehicles—because of the software calibration that controls the SDM—the “wake up” mode lasts for approximately 50 milliseconds or less after the first irregular signal. After that point on the clock, no further input, no matter how severe, could exceed the thresholds and trigger the airbags to deploy and/or seatbelts to tighten. As detailed in this section, the triggering thresholds are pre-set inputs in the software that tell the SDM that a crash is severe enough to deploy an airbag.

46. In addition to concatenated crashes, the SDM Calibration Defect is also implicated in frontal crashes that increase in severity and require airbag deployment or seatbelt tightening after an initial, “soft” impact. These types of crashes are referred to herein as “prolonged” or “long-soft” crash onsets. This would include, for example, a crash into another vehicle’s bumper which—because the bumper is comparatively “soft”—may take time before the “soft” bumper collapses, and a “hard” impact into the engine compartment begins.¹⁶ “Soft” crashes involve a “relatively long crash duration” that may last 20-50 percent longer than a head-on crash into a rigid barrier, like a cement wall.¹⁷

47. In a prolonged onset crash, the initial impact into a “soft” surface, such as a bumper, starts the SDM clock ticking. Depending on the crash conditions, such as speed, road incline, angle of impact, weather, ice on the road, etc., this “soft” impact may not require airbag deployment right away. Throughout the initial “soft” impact, the SDM will be in wake-up mode to search for a confirmatory signal. But it will not find another input sufficient to trigger the airbags from the “soft” impact. In the Class Vehicles, the SDM will then effectively time out at the cutoff imposed by GM Trucks. So, if the crash proceeds through the “soft” layers and into the engine compartment of another vehicle during the “dead zone” after the cutoff—such that airbag

¹⁶ An example of a “soft” crash is where a vehicle crashes into a deformable barrier, or crashes at an angle, which will result in a “softer” impact than a head-on crash into a rigid barrier (which is a “hard” crash). Chan, *supra* note 6, at p. 40.

¹⁷ Chan, *supra* note 6, at p. 40.

1 deployment is needed to protect the occupants at say, 75 milliseconds on the SDM clock—no
2 airbag or seatbelt deployment is possible no matter how severe the “hard” impact is.

3 48. In practice, this means that the airbags and seatbelt pretensioners in the Class
4 Vehicles cannot fire during a time period in crashes when they are necessary. If a second,
5 irregular signal occurs after the cutoff GM imposed due to its defective strategy, the SDM
6 purposefully, by design, disregards the second signal, even if it would otherwise trigger airbag
7 deployment and/or seatbelts to tighten. The net result is a “dead zone,” during which vehicle
8 occupants are completely vulnerable during a complex or long-duration crash. When the SDM
9 clock is above the cutoff time, the dead zone lasts until the SDM detects that the crash has ended
10 completely (meaning that the irregular signals have concluded, and the vehicle has resumed
11 normal operation), and then resets back to normal mode. After the SDM has reset, additional
12 impacts or irregular inputs register as new events, triggering the process to begin anew.

13 49. This significant gap in protection due to the cutoff is unreasonably dangerous
14 because accidents—particularly complicated, real-world accidents—are not necessarily
15 completed at the aggressive cutoff points GM used. In many cases, a crash continues in the “dead
16 zone,” and the thresholds severe enough to trigger deployment are technically met during that
17 time, but rendered inert. GM cars recognized this when it used a materially longer and safer
18 cutoff for its vehicles. In contrast, GM’s SDM software calibration in the Class Vehicles with its
19 early “dead zone” is a serious, unjustified, and dangerous safety defect.

20 C. **GM knew that the SDM Calibration Defect was dangerous and unjustified**
21 **but has failed to warn or compensate consumers.**

22 50. GM knew or had reason to know of the SDM Calibration Defect and the risks it
23 entails from at least July 10, 2009, when GM acquired substantially all of Old GM’s books,
24 records, and personnel, and the knowledge about the defective SDM software calibration those
25 books, records, and personnel held. GM has continued to acquire knowledge—based on lawsuits
26 implicating the SDM Calibration Defect and hundreds of publicly reported accidents with airbag
27 and seatbelt failures—from 2009 to the present.
28

1 51. Nonetheless, GM has continued to conceal this problem and the pattern of
2 accidents, injuries, and deaths that have resulted from it. GM has failed to share this information
3 with the consumers who paid for and drive these Class Vehicles every day.

4 52. It should come as no surprise that GM has unreasonably and unsafely delayed
5 disclosure of the SDM Calibration Defect. Indeed, GM has a recent history of attempts to avoid
6 the costs, potential liabilities, and reputational harms from a safety recall for Takata airbags and
7 seems to have repeated that same tactic here.

8 53. As is now public knowledge, millions of GM vehicles contain the dangerous and
9 defective Takata airbag inflators that can explode with too much force and spray metal shrapnel
10 into vehicle passenger compartments. While the dangers of these Takata airbags were widely
11 known for years, GM lobbied regulators to delay a recall for its affected vehicles to avoid a
12 resulting hit to its profits.¹⁸ In 2016, GM reported that recalling its vehicles with Takata inflators
13 would cost hundreds of millions of dollars.¹⁹

14 54. Consumers brought a putative class action seeking redress. *See In re Takata*
15 *Airbag Product Liability Litigation*, Case No. 14-cv-240009, Dkt. 2750, (S.D. Fl.). While other
16 vehicle manufacturers had earlier and voluntarily recalled their vehicles with Takata airbags, it
17 was only years later, with that consumer litigation pending, that GM finally issued a belated
18 recall. And importantly, it did so only after regulators from NHTSA denied GM's petition for
19 inconsequentiality, in which it attempted to argue that a recall was not necessary.²⁰

20 55. Here, as in *Takata*, GM knew or should have known that the SDM software
21 calibration strategy in the Class Vehicles—which includes a dead zone that prematurely prevents
22 the airbag and seatbelts from deploying—was dangerous. Nonetheless, GM kept using it anyway,
23 did not recall or repair the Class Vehicles to correct it, and still has not told consumers about it.

25 ¹⁸ “GM seeks to delay recall of 1 million vehicles with Takata air bag inflators.” *Reuters*,
26 September 16, 2016. Available at: [https://www.reuters.com/article/us-gm-recall/gm-seeks-to-](https://www.reuters.com/article/us-gm-recall/gm-seeks-to-delay-recall-of-1-million-vehicles-with-takata-air-bag-inflators-idUSKCN11M27N)
27 [delay-recall-of-1-million-vehicles-with-takata-air-bag-inflators-idUSKCN11M27N](https://www.reuters.com/article/us-gm-recall/gm-seeks-to-delay-recall-of-1-million-vehicles-with-takata-air-bag-inflators-idUSKCN11M27N) (last visited
28 July 27, 2023).

¹⁹ *Id.*

²⁰ “GM will recall 7 million vehicles for air bag issue worldwide.” *Reuters*, November 23, 2020.
Available at: [https://www.reuters.com/article/us-gm-recall/gm-will-recall-7-million-vehicles-for-](https://www.reuters.com/article/us-gm-recall/gm-will-recall-7-million-vehicles-for-air-bag-issue-worldwide-idUSKBN2831TH)
air-bag-issue-worldwide-idUSKBN2831TH (last visited July 27, 2023).

1 1. **Old GM recklessly downplayed serious risks of injury when it chose to**
 2 **include the SDM Calibration Defect in the Class Vehicles.**

3 56. In general, the vehicle manufacturer provides the requirements to set the
 4 deployment thresholds in the SDM software calibration that will trigger a command to fire the
 5 airbags and/or tighten the seatbelts. The vehicle manufacturer uses results from laboratory crash
 6 testing to inform these parameters.²¹

7 57. But laboratory results are not sufficient in themselves, because real-world
 8 accidents—which can occur from multiple angles and involve inputs from myriad variables like
 9 weather, temperature, or incline—will differ from the testing environment.²² For that reason,
 10 manufacturers must exercise appropriate care to design crash sensing frameworks that function to
 11 keep people safe in the real world.

12 58. As relevant to the defect here, Old GM worked with Delco Electronics (later called
 13 Delphi Electronics, now known as Aptiv) to select and install SDM models and develop the SDM
 14 software program used in the Class Vehicles, starting with Model Year 1999. As to the physical
 15 component, Old GM installed Delco SDMs in many of its vehicles, including all the Class
 16 Vehicles. The model names for Delco SDMs have changed over time, and have included, from
 17 earliest to latest, models known as the SDM-GS,²³ SDM-11, SDM30, and others. GM continued
 18 to use Delco SDMs and the defective calibration in its vehicles after it was formed in 2009,
 19 including in all the Class Vehicles.

20 59. In addition to the Delco hardware, GM also worked with Delco to develop and
 21 implement the software that controls the SDMs. To that end, Delco developed a proposed
 22 software program, known originally as ALGO-S, and presented it to Old GM for review.

23 60. During this time, Old GM divided the design and development of its vehicles into
 24 a “cars” group and a “trucks” group, with the Trucks Group responsible for design, development,
 25 and production of larger model trucks and SUVs. After it reviewed the Delco team’s proposed
 26

27 ²¹ Huffman, *supra* note 9.

28 ²² Solomon, *supra* note 10, at 13.

²³ The SDM-GS is the SDM model included in Mr. Nossar’s 2005 Trailblazer, which would have
 been in development during Mr. Caruso’s tenure with Delco, which ended in 2006.

1 SDM software algorithm, ALGO-S, the Trucks Group insisted on adding the aggressive and
2 premature cut off when it calibrated that program for use in its trucks and SUVs. Specifically, the
3 Trucks Group insisted on a limit at approximately 45 milliseconds, well before a real-world
4 accident could foreseeably require airbag deployment.

5 61. The premature cut off was dictated by GM Trucks as part of its calibration strategy
6 for all vehicles within the fleet. This means that regardless of any differences across makes and
7 model years, all vehicles under the direction of the Trucks Group include SDM software that was
8 calibrated to meet GM Trucks' guiding philosophy for when and how the safety systems will
9 deploy, which included the SDM Calibration Defect.

10 62. On information and belief, the Trucks Group insisted on this cutoff based on test
11 results which indicated that frontal-barrier accidents (i.e., a simulated, single-impact crash into a
12 hard barrier) in its trucks and SUVs would not require airbag deployment after approximately 45
13 milliseconds or less in laboratory conditions.

14 63. In response, the Delco team expressly warned the Trucks Group that such an
15 aggressive cutoff could fail to capture additional signals in complex crashes outside of the
16 laboratory, leaving occupants completely unprotected during prolonged onset crashes or crashes
17 with multiple impact points. Put another way, using a limit derived from laboratory testing results
18 was not reasonable or safe, because it fails to account for the complexities and durations of real
19 world crash events, which can reasonably and foreseeably take twice as long as the laboratory
20 tests to require airbag deployment. On information and belief, documents, records, and personnel
21 reflecting GM Trucks' insistence—over Delco's objection—to include this cutoff were passed on
22 from Old GM to New GM in 2009.

23 64. GM's own cars group, and on information and belief, other major vehicle
24 manufacturers throughout the industry, include a significantly longer window for the SDM to
25 detect a potential accident and deploy the airbags and seatbelts. Indeed, in the ALGO-S program
26 as it was originally designed by Delco, the window in which the airbags and seatbelts can deploy
27 in a crash is at a minimum **twice to three times** that used by GM Trucks. Delco's original design
28 reasonably allows for airbag and seatbelt deployment in real-world frontal crashes, which

1 themselves can endure for 100 or even 150 milliseconds.²⁴ As such, when GM trucks added the
2 defective premature cutoff to the software calibration in the Class Vehicles, it dangerously
3 prevented the airbags and seatbelts from functioning when a frontal crash may still be well
4 underway.

5 65. Tellingly, after the Delco team repeated the same warnings about the Truck
6 Group's proposed cutoff strategy to GM's cars group, the cars group rejected the shorter cutoff.
7 Instead, the cars group used the ALGO-S software with a materially longer deployment window
8 than GM Trucks group's proposal (a *minimum* of approximately 100 milliseconds for
9 deployment). GM thus also ignored the cars group's decision in insisting on the dangerous
10 calibration for trucks and SUVs.

11 66. Given their serious concerns about GM Trucks' deployment strategy, Mr. Caruso
12 and his Delco team refused to release the defective software calibration for use in GM trucks and
13 SUVs until Old GM signed a disclaimer of Delco's liability for the modified calibration. The
14 Trucks Group still insisted on the defective calibration, signed the disclaimer, and the dangerous
15 dead zone was added in the SDM software calibration used in GM trucks and SUVs.²⁵

16 67. This defective calibration was included in all of the trucks and SUVs under the
17 direction of GM's Trucks Group, including all the Class Vehicles. This is so because, as
18 explained above, the abrupt cutoff was part of a calibration philosophy that is not vehicle
19 dependent, i.e., it was a decision on the overall strategy for safety system deployment that applied
20 to all vehicles within the group, including all the Class Vehicles.

21 68. In practice, this meant that GM Trucks leadership set the calibration strategy for
22 all vehicles within the Trucks group (including all the Class Vehicles), and the software engineers
23 tasked with implementing that strategy for individual vehicle platforms were obligated to follow
24 that strategy for all vehicles within the group—the strategy was not set, or adapted, at the
25 individual vehicle level.

26
27 ²⁴ Chan, *supra* note 6, at p. 169.

28 ²⁵ See Objection to Defendants' Motion for Partial Summary Judgment, *McCoy v. General Motors LLC*, Case No. X03- HHD-CV-20-6142910-S (Conn. Sup. Ct), available at: <https://civillinquiry.jud.ct.gov/DocumentInquiry/DocumentInquiry.aspx?DocumentNo=23354481>.

1 69. This group-level approach to vehicle software is logical from a cost and resources
2 standpoint; developing software algorithms is time intensive and expensive, making it effective
3 and ordinary practice to develop one algorithm for use across multiple vehicle makes and models.

4 70. This typical practice of using the same SDM software strategy for groups of
5 vehicles is evidenced by a prior recall conducted by GM in September 2016. Specifically, GM
6 previously recalled some 3,640,000 vehicles across three different model years (from 2014 to
7 2017) due to a “software defect” present in the SDM software in all of those vehicles. As GM
8 described it, the SDM software in *all of these* vehicles included the same “oscillation test” in the
9 software that could “interfere with the SDM’s proper deployment of frontal airbags or
10 pretensioners as required.”²⁶

11 71. This oscillation-test issue is distinct from the defect described in this case, but
12 GM’s use of the same software with the identical defective oscillation test in more than three and
13 a half million vehicles is evidence that GM developed and applied the same SDM software across
14 a very large range of makes and model years.

15 72. The widespread use of this same oscillation test in the SDM software used for a
16 wide variety of makes and models, including both GM cars and trucks, also supports Plaintiffs’
17 allegations in this case that both GM trucks and GM cars used the same SDM software algorithm
18 (which started as ALGO-S) to control the SDMs in the vehicles under their direction, but that GM
19 Trucks modified the algorithm as designed to include the SDM Calibration Defect.

20 73. Finally, the use of the same software calibration strategy across many different
21 vehicles is further supported by Mr. Caruso’s description of his work with Old GM in setting and
22 implementing the software calibration strategy for vehicles at the group level, for the Trucks
23 Group and cars group. *See, e.g.*, Nossar Report, *supra*, at p. 5 (Mr. Caruso recounting the “GM
24 Truck Groups’ edict to set certain crash sensor calibration parameters outside the recommended
25 minimum guidelines set by the crash sensing algorithm designers”).
26
27

28 ²⁶ See General Motors LLC Part 573 Vehicle Safety Recall Report, 16-V-651 (September 2016)
available at: <https://static.nhtsa.gov/odi/rc1/2016/RCLRPT-16V651-2475.PDF>.

2. **GM’s aggressive cutoff was not necessary to protect against “late” airbag deployments.**

74. GM Trucks Group’s insistence on the early cutoff after which the airbags and seatbelts cannot deploy was unjustified and unsafe.

75. On information and belief, the Trucks Group chose to set this aggressive cutoff due to concerns about the potential for airbags to deploy “too late” during an accident. But as the Trucks Group also knew, these concerns were unwarranted given technology that mitigated the risks of “late” airbag deployments.

76. A brief history of airbags in motor vehicles puts this dangerous decision in context. Before 1998, airbag systems were effectively one-size-fits-all. Designed to protect against only frontal crashes, these “first-generation” airbags were built to meet a standardized government test that required they protect an unbelted, midsize adult male dummy (175 pounds) in a 30-MPH crash into a rigid barrier.²⁷ To do so, an airbag had to fill up quickly with gas, resulting in a deployment speed of up to 200 MPH.²⁸

77. Not all vehicle occupants fit this description, however, and the intensity of first-generation airbag deployment could prove dangerous for children and those who were positioned too close to the bag when it inflated (for example, because they had already been thrown forward toward the steering wheel during an under-way accident).²⁹

78. Public perception about airbag safety in motor vehicles, and in turn, the vehicle manufacturers that sold them, turned increasingly unfavorable following reports of late and aggressive deployments in first-generation airbags. Both regulators and vehicle manufacturers recognized the need to address these issues.³⁰ Beginning in October 1995, NHTSA initiated a

²⁷ Jack Keebler, *Airbags Safe Insane? – Special Report*, Motortrend (Sept. 1, 2000), <https://www.motortrend.com/news/airbags-safe-insane-special-report/> (last visited July 27, 2023).

²⁸ *Id.*; see also David B. Ottaway & Warren Brown, *From Life Saver to Fatal Threat*, The Wash. Post (June 1, 1997), <https://www.washingtonpost.com/archive/politics/1997/06/01/from-life-saver-to-fatal-threat/56d05b9e-a1bc-49b7-beb4-43480762b25e/> (last visited July 27, 2023).

²⁹ Susan A. Ferguson & Lawrence W. Schneider, *An Overview of Frontal Airbag Performance with Changes in Frontal Crash-Test Requirements: Findings of the Blue Ribbon Panel for the Evaluation of Advanced Technology Airbags*, Traffic Injury Prevention 3 (Nov. 2008).

³⁰ U.S. Department of Transportation, NHTSA, *An Evaluation of the 1998–1999 Redesign of Frontal Air Bags*, NHTSA Technical Report No. DOT HS 810 685, p.11, (August 2006) [hereinafter “NHTSA Redesign Report”]; see also Ferguson & Schneider, *supra* note

1 series of actions to minimize and eventually eliminate the adverse effects of late and aggressive
2 airbag deployments while preserving their life-saving benefits.³¹

3 79. In 1997, NHTSA issued modified federal rules to allow automakers to reduce the
4 energy in frontal airbags. This led to “an industry-wide changeover” to “redesigned” airbags in
5 the very next model years (1998-1999).³² The “redesign” consisted of several new technological
6 innovations. The first and immediate solution was “depowered” airbags: automobile
7 manufacturers removed some of the gas-generating propellant or stored gas from the inflators to
8 reduce the pressure and velocity of deployments. This change alone was highly effective in
9 reducing low-to-moderate speed fatalities.³³

10 80. Other innovations to reduce the risk of aggressive deployments included reducing
11 the volume or rearward extent of airbags, positioning them further from occupants, revised
12 folding techniques, and tethering and shifting from pyrotechnic inflators to hybrids including
13 stored gas.³⁴

14 81. Old GM knew about and employed these new technologies in its vehicles. Indeed,
15 as the director of Old GM’s Safety Center Terry Connolly said in 2000, there were no significant
16 downsides to using this new “depowered” airbag technology, even for unbelted passengers.³⁵

17 82. Further innovations referred to as “advanced” or “smart” airbags followed soon
18 thereafter.³⁶ “Advanced” airbags alter deployment patterns according to feedback from several
19 sensors. These sensors tailor how the airbag deploys based on the severity of the crash, the size
20 and posture of the vehicle occupant, whether the occupant is wearing a seatbelt, and how close
21 the occupant is to the airbag.³⁷

22
23
24 30.

³¹ NHTSA Redesign Report, *supra* note 31, at vii.

25 ³² *Id.*; see also Micah Wright, *The Hidden Dangers of Older Airbags*, MotorBiscuit (May 8,
26 2015), <https://web.archive.org/web/20220630111938/https://www.motorbiscuit.com/the-hidden-dangers-of-older-airbags> (last visited July 27, 2023).

³³ See NHTSA Redesign Report, *supra* note 31 at 25.

27 ³⁴ *Id.* at vii.

³⁵ Keebler, *supra* note 27.

28 ³⁶ See NHTSA Redesign Report, *supra* note 31 at p. 3.

³⁷ Wright, *supra* note 33.

83. Many “advanced” systems use dual-stage or multi-stage inflators. This means that they have two inflation stages that can be ignited sequentially or simultaneously depending on crash severity.

84. “Advanced” airbags phased into production beginning September 1, 2003 and were required in all new vehicles by September 1, 2006.³⁸

85. Thus, based on the depowered and advanced airbag technology starting in 1998 and 1999, the risks posed by “late” deployments in early generation airbags had greatly diminished. Indeed, while NHTSA estimates that more than 290 deaths were caused by frontal airbag inflation between 1990 and 2008, nearly 90 percent of those deaths occurred in vehicles manufactured before 1998 (i.e., with first-generation airbag technology).³⁹ Today, with this new technology, serious injuries from properly functioning airbags are rare.⁴⁰

86. Despite knowledge and use of the new technology mitigating the risks of late deployments, the Trucks Group still insisted on prematurely shutting off the airbags and seatbelts in the Class Vehicles long before the 100 millisecond minimum window reasonably required by real-world crashes, and used by GM’s own cars group. On information and belief, despite these well-established advancements in airbag technology outlined above, GM continued to use this same defective software calibration strategy in its vehicles in 2009 and beyond.

3. GM knew about a pattern of suspicious accidents involving the SDM Calibration Defect in the Class Vehicles.

87. GM’s reckless decision and continued disregard for clear warnings about the risks in shutting off the SDM too soon during an accident has had real and tragic consequences.

88. As outlined above, GM has known about the SDM Calibration Defect since it took over Old GM’s books, records, and personnel in 2009. GM has continued to accrue knowledge of the defect, and its serious consequences, in the years since. Indeed, GM has known about, investigated, and even litigated numerous crashes in which airbags suspiciously failed to deploy

³⁸ NHTSA Redesign Report, *supra* note 31, at vii.

³⁹ Insurance Institute for Highway Safety. “Airbags” (2021), available at: <https://www.iihs.org/topics/airbags> (last visited July 27, 2023).

⁴⁰ *Id.*

1 in multi-impact or prolonged-onset frontal crashes in the Class Vehicles—a clear indication of the
2 SDM Calibration Defect.

3 89. Despite obvious signs of a known and dangerous risk, GM concealed these
4 accidents and the SDM Calibration Defect from consumers and regulators to avoid or at least
5 delay a recall and the attendant costs and reputational damage therefrom. To date, GM has taken
6 no corrective action to repair or recall the Class Vehicles to address this defect.

7 a. **GM has litigated (and settled) many personal injury lawsuits**
8 **for suspicious airbag failures in the Class Vehicles.**

9 90. In addition to its institutional records and knowledge, GM was on notice of the
10 SDM Calibration Defect through litigating and settling personal injury lawsuits involving airbag
11 and seatbelt failures consistent with the SDM Calibration Defect.

12 91. As noted above, Chris Caruso has served as an expert witness in many of these
13 lawsuits. Mr. Caruso has “over 43 years working in the automotive engineering field.” Exhibit D
14 at 4. This includes work as an engineer for Old GM from 1979 to 1986. Thereafter, from 1986 to
15 2006, Mr. Caruso worked for Delco Electronics, where he was “involved in the development and
16 implementation of the second generation of airbag system on GM vehicles and their subsidiaries
17 in the US.” *Id.* at 1. Mr. Caruso also worked as a “lead engineer in the development of crash
18 sensor specifications and the airbag sensing systems for major OEM’s worldwide,” including Old
19 GM, and himself “designed the SDM crash sensing algorithms.” *Id.* at 1-2. Mr. Caruso worked
20 for Delco through August of 2006. Thereafter, he began work in his current role as a consultant
21 with Automotive Safety Consulting, where he has “served as a consultant for both plaintiffs and
22 defendants in numerous cases involving automotive safety systems, including cases involving
23 EDR/CDR downloads and readouts.” *Id.* at 4.

24 92. Mr. Caruso recounts much of this work experience and the history of the SDM
25 Calibration Defect in public documents in a case filed in 2011, just two years after GM was
26 formed.

27 93. In that case, Plaintiff James Nossar sued GM LLC following a crash in his 2005
28 Chevrolet Trailblazer (a Class Vehicle here). As detailed in that complaint, on or about February

1 25, 2010, Mr. Nossar drove his Trailblazer into the back of a 1999 Suburban “and sustained a
 2 moderate to severe frontal impact . . . at a rate of speed that exceeded the airbag system’s
 3 predetermined deployment threshold.” *See Nossar v. General Motors LLC*, Dkt. 4, Case No. 1:11-
 4 cv-02129 (N.D. Ga.). Despite this “significant frontal collision,” the airbag failed to deploy and
 5 seatbelt pretensioners failed to trigger. Without the airbag or seatbelt to protect him, Mr. Nossar’s
 6 head slammed into the steering wheel, which caused “fracturing practically every bone in his face
 7 and brain injuries.” *Id.*

8 94. In support of his claims, in April 2012, Mr. Nossar filed an expert report from
 9 Chris Caruso who, as explained above, is an expert in automotive crash sensing systems who
 10 worked for Delco engineering during the development of the defective SDM software calibration
 11 in the Class Vehicles. *See id.* at Dkt. 40-1.

12 95. In that report, Caruso detailed the same flaws in the SDM software calibration
 13 described herein. He explained that the airbag sensing system in the Trailblazer was “defective by
 14 design and has the potential to not deploy frontal impact airbags in high speed frontal impacts
 15 where conditions vary slightly from the perfect laboratory conditions where the system was
 16 designed and tested.” Based on Caruso’s experience working in the development of the SDM
 17 software, he related that there were concerns, due to the calibration, “that in longer duration, but
 18 high severity events and in concatenated events (such as a curb impact followed by a utility pole
 19 impact), the airbags would fail to deploy because the algorithm deployment thresholds were no
 20 longer active.” *Id.*

21 96. Caruso further explained that as that litigation proceeded into discovery, he would
 22 “expect to identify emails and other correspondence between GM Truck Engineers and Delphi
 23 Crash Sensor engineers discussing the concerns over GM Truck Groups’ edict to set certain crash
 24 sensor calibration parameters outside the recommended minimum guidelines set by the crash
 25 sensing algorithm designers [the Delphi/Delco engineers].” Caruso expected to obtain this
 26 corroborating evidence because he “ha[d] seen these documents before and kn[e]w the content,”
 27 and summarized that **“the calibration values result in premature turning off of algorithm**
 28

1 **thresholds which effectively disables the front airbags after 45 to 50ms.”** *Id.* (emphasis
2 added).

3 97. Mr. Caruso’s expectations as to what discovery would reveal are plausible because
4 of his contemporaneous experience with Delco and Old GM in the time period in which Mr.
5 Nossar’s vehicle was developed. Mr. Caruso left Delco in 2006, long after the development
6 concluded for Mr. Nossar’s model year 2005 vehicle. (Because vehicles are actually sold in their
7 model year, *i.e.*, 2008 vehicles are sold in 2008, their design and development, including for the
8 SDM software, predates the actual model year by, one, two, or more years).

9 98. As to Mr. Nossar’s 2005 Trailblazer specifically, Caruso observed that the vehicle
10 included a version of the SDM hardware known as the SDM-DS, and concluded:

- 11 • The airbags and seatbelts failed because, at the time the airbags should have
12 deployed, and consistent with the SDM Calibration Defect here, **“the SDM
13 calibration had already timed out after 45-50ms** after the crash started.”
- 14 • “In reviewing the crash performance of the sensing system for the subject vehicle,
15 with respect to the conditions of the subject crash, **it is clear that the calibration
16 values result in premature turning off of algorithm thresholds which
17 effectively disables the front airbags after 45 to 50ms.”**

18 99. “The failure by GM to understand the **risks of certain dictated calibration**
19 **values** [in the SDM software calibration] led directly to the design defect that rendered the frontal
20 impact airbag system in the 2005 Chevrolet Trailblazer defective and unreasonably dangerous in
21 certain field relevant, real-world crashes.” *Id.*

22 100. GM LLC, a named defendant in the *Nossar* case, clearly knew about and received
23 Mr. Caruso’s report outlining the history of these issues in the SDM software calibration.

24 101. The *Nossar* case and Mr. Caruso’s report support that Old GM continued to install
25 SDMs with the Calibration Defect in its vehicles at least through model year 2005.

26 102. More recently, Mark McCoy filed a lawsuit against GM LLC in 2020 after a
27 serious accident in his 2018 Sierra Denali 2500. *See McCoy v. General Motors LLC*, Case No.
28 X03- HHD-CV-20-6142910-S (Conn. Sup. Ct).

103. While on a freeway exit ramp, at a sharp turn, Mr. McCoy veered off the road, crashed into a fence, and then crashed into a trailer, before finally crashing into a construction vehicle parked near the ramp. None of the airbags in his vehicle deployed. As a result, Mr. McCoy sustained “catastrophic, painful and severely debilitating injuries,” including traumatic spinal injuries, total paralysis from the chest down, a traumatic brain injury, and a broken nose, among other injuries.⁴¹ Below is a picture of Mr. McCoy’s Denali after the crash:



104. Mr. Caruso also served as an expert for plaintiff in the *McCoy* case and submitted a detailed report in connection with summary judgment briefing in that matter.⁴² Therein, Mr.

⁴¹ See June 19, 2020 Amended Complaint, ¶ 8, *McCoy v. General Motors LLC*, Case No. X03-HHD-CV-20-6142910-S (Conn. Sup. Ct) (“McCoy”). Available at:

<https://civilinquiry.jud.ct.gov/DocumentInquiry/DocumentInquiry.aspx?DocumentNo=19161992>

⁴² Mr. Caruso’s opinions in the McCoy case became publicly available only after the April 2022 hearing on the Defendants’ motion to dismiss in this matter, and were also not available at the time Plaintiffs filed their amended complaint in October 2021.

1 Caruso described his history with the company, including warning Old GM against using the
2 defective software calibration in trucks and SUVs, and his insistence on a disclaimer of liability
3 before releasing the calibrations for use in the Class Vehicles.

4 105. Further, Mr. Caruso described his work after he left Delco in 2006 in failure-to-
5 deploy lawsuits “where the root cause was determined to be the 45ms SHUTOFF criteria” [i.e.,
6 the SDM Calibration Defect]” in “numerous” GM trucks and SUVs in “earlier model[s]” than
7 model year 2018.⁴³

8 106. Through discovery in the *McCoy* matter, Mr. Caruso analyzed the actual software
9 calibration file for the SDM software in Mr. McCoy’s model year 2018 vehicle. Based on his
10 review of the file, Mr. Caruso concluded that the algorithm in the 2018 vehicle remained a “carry
11 over” from the SDM software algorithm, ALGO-S, he himself designed years prior. Exhibit D at
12 16. Moreover, Caruso concluded that GM’s dangerous and defective philosophy about airbag
13 deployment timing persisted in the 2018 Sierra. Put another way, GM “appeared to be using **very**
14 **similar shutoff times in this calibration**” to those he had previously objected to in earlier model
15 years in which GM “forc[ed] the use of 45ms shutoff times.” *Id.* at 18.

16 107. Specifically, in the *McCoy* software, Caruso observed shutoff times at 50
17 milliseconds, consistent with his earlier testimony in *Nossar* that the cutoff occurred at
18 approximately 45-50 milliseconds, and others that were even shorter, at 16 milliseconds.

19 108. Whether 45, 50, or even 16 milliseconds, each of these cutoff calibrations is
20 defective in the same way, because none are sufficient to account for real world crash events, or
21 come even close to the minimum used by GM cars. Put another way, each creates a “dead zone”
22 far short of the time window needed for deployment in real world crashes, which is the defect that
23 underlies Plaintiffs’ claims.

24 109. The persistence of this defective calibration cutoff strategy in a GM truck sold at
25 least 12 years after he stopped working for Delco came as some surprise to Caruso. Indeed, he
26 “had believed” GM would have discontinued the use of the dangerous calibration prior to model
27 year 2018. But the software itself told a different story. In summary, based on the actual software,
28

⁴³ Mr. Caruso’s report in the *McCoy* matter is attached hereto as Exhibit D. *See id.* at 19.

discovery produced in that case, as well as the crash conditions from the McCoy accident, Caruso opined:

- “The failure to deploy [the] airbags resulted in a condition that was defective, unsafe and unreasonably dangerous” to the driver in this vehicle;
- “[I]t appears that [GM trucks Group] is **still employing very aggressive stop times**” in its software calibrations as of model year 2018; and
- GM should have implemented an “alternative design” to “[m]odify the algorithm calibrations with more robust 120-150ms” cutoff thresholds.

See Exhibit D.

110. Caruso’s report in the *McCoy* case—notably based on his review of the actual software calibration—demonstrates that at least through model year 2018, GM continued to install Delco SDMs governed by dangerous cutoff thresholds in calibrations based on the original ALGO-S software algorithm. Although it had years to do so, even by 2018, GM had still failed to adopt a safer and more rational design that would allow for deployment for at least as long as the strategy used by GM cars (*i.e.*, approximately 100 milliseconds at a minimum for deployment).

111. Mr. Caruso also was able to identify the SDM hardware used in the McCoy vehicle as the Delco SDM30, which is evidence that GM continued to use the defective software calibration for all vehicles that contain that Delco SDM model. Publicly available crash data reports from NHTSA show the same Delco SDM30 was installed by GM in GM trucks in at least model years 2015 and 2016, including in the model year 2015 Chevrolet Trax, 2015 Chevrolet Tahoe, and 2016 Yukon Denali.

112. Likewise, on information and belief, Plaintiffs Vargas, Ray, and Milstead’s Class Vehicles contain SDM-11 model Delco SDMs. Given their model years and the Delco SDM, the plausible, and most reasonable, inference is that they also included the associated defective calibration strategy GM used with Delco SDMs.

113. Based on: (1) Mr. Caruso’s early knowledge of the SDM Calibration Defect when it was first used; (2) his subsequent tenure with Delco through 2006, during which model year vehicles for subsequent years were already in development; (3) his expert opinion on the presence of the SDM Calibration Defect in a model year 2005 vehicle (*Nossar*) after his assessment of the

1 vehicle performance and crash dynamics; and (4) his opinion about defect’s persistence in a
 2 model year 2018 vehicle with the Delco SDM30 (*McCoy*)—the plausible, and most reasonable,
 3 inference is that the defect persisted in the years between 1999, 2005 and 2018.

4 114. Following service of Mr. Caruso’s expert report and deposition in the *McCoy* case,
 5 GM agreed to settle the case in December 2022.⁴⁴

6 115. In addition, Chad Vaith filed a lawsuit against GM LLC in 2017 after an accident
 7 in his MY 2014 Silverado. As that complaint relates, in December 2015, Mr. Vaith was involved
 8 in an accident in which he drove his Silverado “off the road into a ditch,” after which he
 9 “continued through the ditch for approximately forty yards before launching over the
 10 driveway/culvert. . . before coming to a final rest approximately twenty yards south.” *See Vaith v.*
 11 *General Motors LLC*, Dkt. 1, Case No. 18-cv-00031 (D. Minn.). Despite multiple impacts in that
 12 prolonged accident, the airbags and seatbelts did not deploy, causing Mr. Vaith to “suffer severe
 13 personal injuries.” Mr. Caruso was a disclosed expert for plaintiff in that case, although his
 14 opinions about the 2014 Silverado were not publicly filed. *See, e.g., id.* at Dkt. 64.

15 116. Mr. Vaith’s case proceeded into fact discovery and ultimately resulted in a
 16 “negotiated settlement” between Mr. Vaith and GM. *Id.* at Dkt. 82.

17 117. In addition to these previous lawsuits against GM with Mr. Caruso as an expert,
 18 another automotive crash expert, Sal Fariello, wrote directly to GM’s CEO Mary Barra twice in
 19 December 2016 to raise similar concerns about issues he had observed in the airbag sensing
 20 system in model year 2006 GM SUVs. Mr. Fariello’s letters are available in NHTSA’s public
 21 records.⁴⁵

22 118. Mr. Fariello’s letters to GM’s CEO focused on an accident in a 2006 Trailblazer (a
 23 Class Vehicle here) for which he served as a litigation consultant in a lawsuit filed in or around
 24

25 ⁴⁴ Plaintiffs’ allegation of a settlement is supported by plaintiff’s request in *McCoy* in October
 26 2022 for additional time to withdraw the case because “additional time is necessary to exchange
 27 the necessary settlement documents.” *See McCoy*, October 19, 2022 CaseFlow Request. Plaintiff
 28 then withdrew the matter last month, in December 2022. *See* December 19, 2022 Withdrawal of
 Action, *McCoy v. General Motors LLC*, Case No. X03- HHD-CV-20-6142910-S (Conn. Sup. Ct).
⁴⁵ Mr. Fariello is a forensic crash investigator. *See* Bill Saporito, “Air Bag Blow Out,” *Time*
Magazine, (December 4, 2014). Available at: <https://time.com/3617681/the-air-bag-blowout> (last
 visited July 27, 2023).

2014. Therein, he lists multiple technical issues with the airbag sensing system that he wanted to bring to GM’s attention and urge them to address. For example, he cautions that, in his view:

a. “The deployment thresholds [i.e., the inputs that will trigger deployment] for the airbag were set too high and compromised driver and passenger safety as a result of GM’s improper effort to mitigate lawsuits related to relatively low speed deployments of the airbag.”;

b. “The deployment threshold did not meet GM’s and generally accepted standards for when an airbag should deploy in order to prevent occupant death based on written technical papers and educational videos produced by GM or its employees.”; and

c. “Failure of the SDM to independently process a crash pulse and deploy the airbag implicates a defective software algorithm; specifically ‘Algo S-H’ [the software algorithm in the Class Vehicles].”

119. At the time, in 2016, Mr. Fariello proposed that the SDM could be re-programmed “with a more responsive algorithm” to resolve these issues, and that GM’s “only apparent motive for not doing this related to the cost of implementing a recall.”

120. Frustrated by the response he received from GM’s counsel in response to these letters, Mr. Fariello then wrote to Senator Bill Nelson of Florida enclosing his correspondence to GM and escalating his concerns. Senator Nelson then forwarded that correspondence to NHTSA.⁴⁶

121. As Mr. Fariello concluded, in his view, GM was stalling on this issue “just as they did with the Takata airbag matter.”

122. In April 2016, plaintiff Kayla Greenwood filed suit against GM on behalf of her deceased parent, Galen Greenwood. *See Greenwood v. General Motors LLC and General Motors Company*, Dkt. 1, Case No. 16-cv-00149 (M.D. GA). Galen Greenwood was fatally injured when his “airbag failed to deploy and his seat belt failed to properly restrain him” during a multi-impact crash in his 2006 GM SUV, a Chevrolet Equinox—hallmarks of the SDM Calibration Defect. *Id.* Specifically, “Mr. Greenwood lost control of the subject vehicle, traveled over the northbound

⁴⁶ Mr. Fariello’s letters to GM and further documentation are available at: <https://static.nhtsa.gov/odi/cmpl/2017/CL-10955948-3381.pdf> (last visited July 27, 2023).

lane and onto the west shoulder in a gradual manner, and impacted two trees with the front of the subject vehicle. During the incident sequence, the driver's side airbag failed to deploy and the seat belt failed to properly restrain Plaintiff's decedent. During the impact, Galen Greenwood suffered severe injuries which resulted in his death." *Id.* GM settled with Ms. Greenwood in May 2017. *See id.* Dkt. 20-1.⁴⁷

123. Finally, in 2022, Jerome and Cedric Woods filed suit against MFA Oil Company in Missouri state court as survivors of Richard Stinson. Mr. Stinson was killed when his 2009 Chevrolet Silverado truck crashed into an MFA Oil Company truck in November 2021. Mr. Stinson's Silverado was traveling at approximately 46 miles per hour at the time of the collision, and despite the serious "extent of the damage," the speed of the accident, and the change in velocity from the impact, his airbags did not deploy.

124. In or about March 2023, defendant MFA Oil Company filed a third party petition against General Motors LLC in the *Woods* case. As MFA contends in that third party petition:

- "Upon information and belief, the airbag system on the Silverado was designed to not deploy under circumstances when the change in velocity of the vehicle [i.e., a deployment threshold input] **in the initial 45 milliseconds after the initiation of a collision event was under a set rate regardless of the change in velocity of the vehicle after the initial 45 milliseconds**, including a situation such as the collision in this case in which a change in velocity was recorded to exceed 37 miles per hour during the sequence of the collision."
- **The design settings for deployment of the driver's side airbag on the Silverado were defective and unreasonably dangerous because the settings prevented deployment of the driver's side airbag** under circumstances such as the collision at issue in this case in which the change in velocity of the vehicle exceeded 37 miles per hour and in which the deployment of the airbag could or would have reduced or entirely avoided serious or fatal injuries such as the injuries Stinson sustained.⁴⁸

125. The *Woods* litigation on Mr. Stinson's behalf continues.

⁴⁷ In the *McCoy* matter, GM's designated corporate witness testified that he had previously offered testimony in a personal injury lawsuit about a crash where a vehicle "went off the roadway and struck a tree," where the plaintiff's name was Greenwood. On information and belief, GM's corporate designee in the *McCoy* matter was thus also a deponent in this settled Greenwood lawsuit, demonstrating further corporate knowledge of persistent injuries from the SDM Calibration Defect in the field.

⁴⁸ *See Third-Party Plaintiffs' Petition, Woods v. MFA Oil Company v. General Motors LLC*, Case No. 22-NM-CV00032 (New Madrid Circuit Court, Missouri).

126. Taken together, these and other allegations support the existence of the SDM Calibration Defect and the reasonable inference that Plaintiffs’ model years 2010 and 2012 GM trucks and SUVs included it. Specifically, given that: (1) the model years of Plaintiffs’ Class Vehicles were developed *after* Old GM first used the defective Software Calibration in or about 1999, and not long after Mr. Caruso left his role with Delco in 2006 (during which subsequent model years were already in development); (2) Plaintiffs’ Class Vehicles predate the 2018 vehicle in which Mr. Caruso reviewed the software calibration, and concluded that the algorithm still reflects GM’s flawed strategy to cutoff deployment too early, including “very similar shutoff times” to those he had originally raised concerns about twenty years earlier; (3) corroborating instances between those two bookends (1999 and 2018) support the persistence of the defective calibration in the intervening model years (i.e., *Nossar, Vaith, Greenwood, Woods, and Fariello’s* letters, discussed *supra*); and (4) the broad, cross-model way that SDM software calibration strategy is set and implemented across GM’s fleet within a given model year, the plausible, and most reasonable inference is that GM installed the same defective calibration in all its trucks and SUVs at least through model year 2018.

b. GM knew or should have known about hundreds of publicly reported airbag failures in the Class Vehicles.

127. GM was also on notice of the SDM Calibration Defect and its attendant safety risks from consumer complaints. These complaints are publicly available online through NHTSA’s website. Between 1999 and the present, hundreds of consumers reported to NHTSA that airbags and/or seatbelts had suspiciously failed during frontal crashes involving concatenated (multiple) impacts or potentially prolonged crash onsets. New allegations—including Mr. Caruso’s report showing the defective cutoff strategy continued in a model year 2018 vehicle—make the below crashes even more suspicious as relevant incidents with the hallmarks of the SDM Calibration Defect (airbag and seatbelt failures in concatenated and prolonged frontal impacts) in the very vehicles alleged to be impacted by that Defect (GM trucks and SUVs).

128. On information and belief, vehicle manufacturers such as GM monitor these public databases for complaints about their vehicles, considering their statutory obligations to report

1 known safety defects in their vehicles to NHTSA and to consumers. Moreover, in many of these
 2 reports, it is expressly clear that GM was directly informed of, and even investigated, the accident
 3 in question. While GM has access to the full body of these complaints from 1999 and onward in
 4 the public database, it bears mention that over three hundred of them were filed after the new GM
 5 entities were created in 2009.⁴⁹

6 129. One such complaint details an accident in a 2004 Chevrolet Trailblazer in August
 7 2014. The driver states that they were traveling 50 MPH on a four-lane highway where another
 8 vehicle, waiting to U-turn, “decided to turn right into me—oncoming traffic.” The vehicles
 9 crashed, which then “sent [the driver] into a head on collision with the guard rail.” The driver
 10 questions that “there were 2 incidents in that sequence of events that the airbags should have
 11 deployed, but did not! This accident caused several injuries to myself and my passenger. We
 12 definitely could have been killed and no airbags to help save our lives...” Photos of the damage to
 13 the vehicle from that accident follow. (NHTSA Complaint #1100694).



49 Many publicly reported accidents occurred prior to 2009, which information would likewise have been available to Old GM. GM would have acquired Old GM’s knowledge of these accidents, reflected in its books, records, and personnel, when it was formed in 2009.



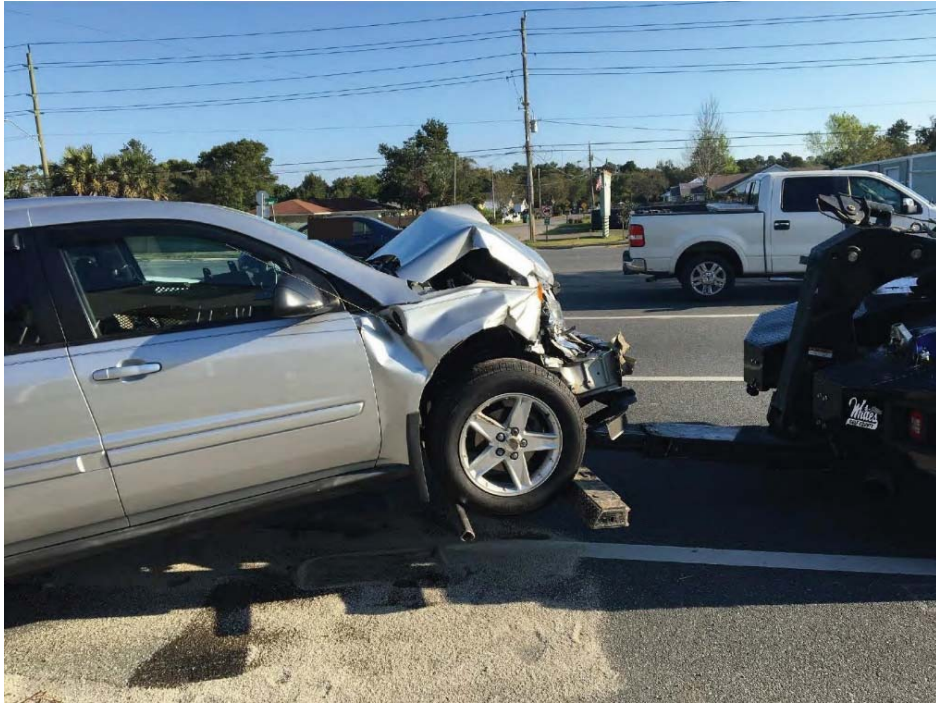
130. Another report describes a September 2012 accident in a 2005 Chevrolet Trailblazer. It states that the driver, at 30 MPH, swerved to avoid a deer in the road, which caused the vehicle to lose control, exit the road, and ultimately “crash[] off a 9 foot embankment.” From there, the vehicle continued to crash through a field, into a dirt levy, and finally into a drainage ditch. None of the airbags deployed. The driver “became unconscious after his head crashed into the steering wheel” and “suffered severe neck injuries.” The dealer later inspected the vehicle but responded that the results were “inconclusive” and that the manufacturer “was notified but offered no assistance.” Photos of the damage to the vehicle from that accident follow. (NHTSA Complaint #942950).⁵⁰

⁵⁰ Accident documentation and photos are available at: <https://static.nhtsa.gov/odi/cmpl/2012/EQ-10477257-8767.pdf> (last visited July 27, 2023).

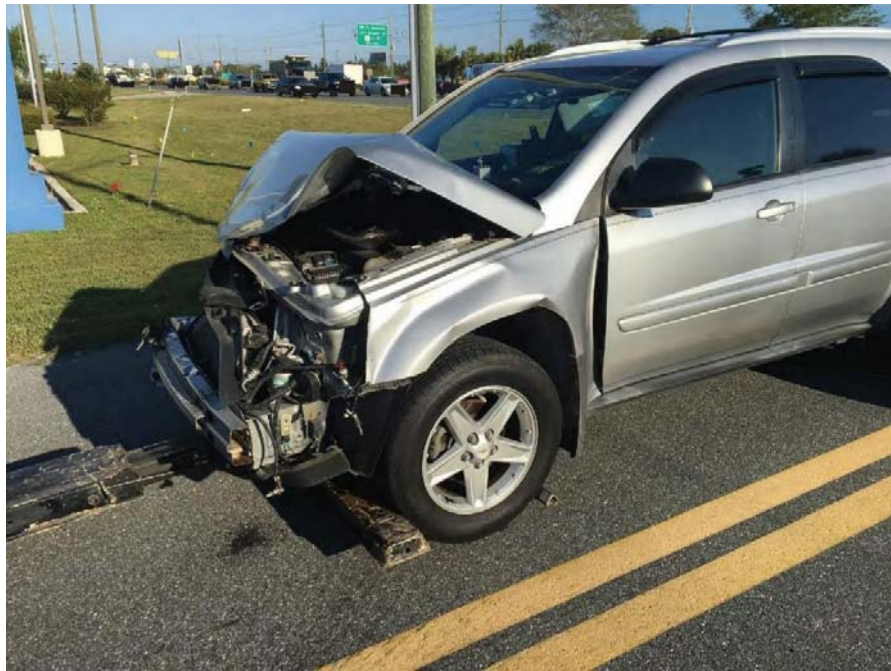


131. In another example, the complaint describes a serious accident in March 2019 involving a 2005 Chevrolet Equinox. The vehicle crashed into the front of another vehicle at 35

1 MPH. The airbags did not deploy. The driver sustained injuries to the head and ankle and
 2 required medical attention. Photos of the damage to the vehicle from that accident follow.



132. (NHTSA Complaint #1550406).⁵¹



133. Another account of a July 2007 accident in a model year 2001 Isuzu Rodeo
 describes a crash at 65 MPH so severe that “the median on the highway sustained property

⁵¹ Photos and accident information are available at: <https://static.nhtsa.gov/odi/cmpl/2019/EQ-11191960-7090.pdf> (last visited July 27, 2023).

1 damage” and “the vehicle was destroyed,” but the airbags did not deploy. This is how the vehicle
 2 looked after that accident:



13 134. Additional examples of similarly suspicious frontal accidents—i.e., frontal
 14 accidents with multiple discrete impacts, or potentially prolonged onset frontal crashes involving
 15 “soft” impacts—in which the airbags and/or seatbelts failed include:

16 a. NHTSA complaint #753287 dated Tuesday, October 16, 2001, reported an
 17 accident on Monday, October 8, 2001 involving a 1999 CHEVROLET SUBURBAN in Andover,
 18 KS. The complaint states: “60 MPH CROSS WIND BLEW THE SUBURBAN HEAD ON INTO
 19 THE CONCRETE MEDIAN. THE VEHICLE SPUN 360 DEGREES, WENT INTO THE
 20 DITCH, THE FRONT END HIT AGAIN THE VEHICLE WENT UP THE OTHER SIDE OF
 21 THE EMBANKMENT AND STOPPED IN A FIELD. ENTIRE FRONT END OF THE FRAME
 22 NOT REPAIRABLE . . . FRONT CROSSMEMBER BENT AND ENGINE MOVED
 23 UPWARDS AT A 10 DEGREE ANGLE. **AIR BAGS FAILED TO DEPLOY. *AK**”⁵²

24 b. NHTSA complaint #859858 dated Friday, April 7, 2000, reported an
 25 accident on Saturday, April 3, 1999 involving a 1999 CHEVROLET SILVERADO. The
 26 complaint states: “WHILE TRAVELING ON A WET ROAD AT HIGHWAY SPEED OF 60
 27 MPH VEHICLE HYDROPLANED, SPUN INTO A DITCH, AND COLLIDED INTO A TREE
 28

⁵² Emphasis is supplied here and in the paragraphs that follow.

1 WITH BOTH SIDES AND FRONT OF VEHICLE. **UPON IMPACT, AIR BAGS FAILED TO**
 2 **DEPLOY.** MFR. NOTIFIED. *AK”

3 c. NHTSA complaint #877320 dated Wednesday, January 3, 2001, reported
 4 an accident on Friday, December 1, 2000 involving a 1999 CHEVROLET SUBURBAN in
 5 Amarillo, TX. The complaint states: “CONSUMER WAS TRAVELING ABOUT 40MPH ON
 6 HIGHWAY AND ANOTHER VEHICLE VEERED INTO HER LANE, HITTING HER HEAD-
 7 ON, AND PUSHING VEHICLE INTO ANOTHER LANE. **VEHICLE HIT TELEPHONE**
 8 **POLE, AND DUAL AIRBAGS DIDN'T DEPLOY.** CONSUMER WAS INJURED.
 9 CHEVROLET HAS BEEN NOTIFIED. *AK”

10 d. NHTSA complaint #10060150 dated Tuesday, March 2, 2004, reported an
 11 accident on Tuesday, February 24, 2004 involving a 2001 CHEVROLET BLAZER in Austin,
 12 TX. The complaint states: “**DRIVER SIDE AIR BAG FAILED TO DEPLOY IN A CRASH**
 13 **THROUGH: 1. A SIX FOOT TALL WOODEN FENCE AT ALMOST 30MPH, THEN 2. THE**
 14 **EXTERIOR SIDE OF A 2-STORY HOME THAT CONTAINED THE KITCHEN SINK AND**
 15 **PLUMBING FIXTURES, WHILE SMASHING UP AND OVER THE FIFTEEN-INCH**
 16 **CONCRETE FOUNDATION, FRONT-END FIRST.*AK”**

17 e. NHTSA complaint #10082050 dated Thursday, July 15, 2004, reported an
 18 accident on Wednesday, July 14, 2004 involving a 2003 CHEVROLET SUBURBAN in Fresno,
 19 CA. The complaint states: “THE CONSUMER WAS INVOLVED IN AN ACCIDENT WHERE
 20 IT WAS HIT FROM THE FRONT DRIVER SIDE, THE IMPACT CAUSED THE VEHICLE
 21 TO HIT A TELEPHONE POLE HEAD ON. **THE AIR BAGS DID NOT DEPLOY.** *JB”

22 f. NHTSA complaint #10103512 dated Friday, December 10, 2004, reported
 23 an accident on Sunday, December 5, 2004 involving a 2001 CHEVROLET SILVERADO in
 24 Rialto, CA. The complaint states: “CONSUMER’S VEHICLE WAS REAR ENDED WHILE
 25 DRIVING 50 MPH. THE VEHICLE WAS FORCE[D] INTO A SPIN AND THEN, IT HIT A
 26 CONCRETE ROAD DIVIDER. UPON IMPACT, **NEITHER FRONTAL AIR BAGS**
 27 **DEPLOYED.** DRIVER SUSTAINED INJURIES, AND HAD TO BE TRANSPORTED TO A
 28 LOCAL HOSPITAL. DEALER AND MANUFACTURER WERE NOTIFIED. THE

1 CONSUMER STATED THAT THE SEAT BELT DID NOT KEEP HER FROM HITTING HER
2 CHEST ON THE STEERING WHEEL.”

3 g. NHTSA complaint #10108404 dated Tuesday, February 1, 2005, reported
4 an accident on Tuesday, January 11, 2005 involving a 2000 CHEVROLET SILVERADO in
5 Toney, AL. The complaint states: “A CAR PULLED OUT IN FRONT OF ME WHICH STILL
6 HIT THE DRIVER'S SIDE OF MY VEHICLE (2000 CHEVY SILVERADO). **THEN MY**
7 **TRUCK HAD A FULL FRONTAL IMPACT AT GREATER THAN 30 MPH INTO A**
8 **DIRT WALL IN WHICH NEITHER THE DRIVER'S NOR PASSENGER'S AIRBAGS**
9 **DEPLOYED (THE TRUCK IS TOTALLED).** I HIT THE STEERING WHEEL AND GOT A
10 CONCUSSION WITH BLOOD AROUND THE BRAIN, A BROKE CHEEK BONE, AND
11 FRACTURED HIP. MY WIFE WAS 33 WEEKS PREGNANT AT THE TIME AND HER
12 WATER BROKE AND SHE GOT A COMPOUND FRACTURE IN THE LOWER
13 LEG/ANKLE. AS A RESULT OF THE WATER BREAKING MY SON WAS BORN 3 DAYS
14 LATER 7 WEEKS PREMATURE. AS FOR WHAT WAS DONE TO CORRECT THE
15 PROBLEM I'M HOPING IT WILL AT LEAST BE INVESTIGATED TO MAKE SURE THIS
16 IS NOT A SYSTEMIC PROBLEM (I.E., SOFTWARE SCREWUP SOMETHING NOT
17 HOOKED UP RIGHT IN THE AIRBAG SYSTEM ETC).”

18 h. NHTSA complaint #10115806 dated Thursday, March 24, 2005, reported
19 an accident on Thursday, March 24, 2005 involving a 2002 CHEVROLET SILVERADO in
20 Claremore, OK. The complaint states: “A PIECE OF FURNITURE WAS LOCATED IN THE
21 MIDDLE OF THE HIGHWAY WHILE DRIVING, CAUSING THE DRIVER TO HIT THE
22 FURNITURE. DRIVER LOST CONTROL OF A VEHICLE, AND IT CRASHED INTO A
23 CONCRETE WALL. DRIVER'S SIDE SEAT BELT FAILED, AND **THE AIRBAGS DID**
24 **NOT DEPLOY.**”

25 i. NHTSA complaint #10158090 dated Tuesday, May 23, 2006, reported an
26 accident on Sunday, February 26, 2006 involving a 2004 CHEVROLET TRAILBLAZER in
27 Fayetteville, NC. The complaint states: “DT*: THE CONTACT STATED WHILE DRIVING 50
28 MPH THE VEHICLE WAS INVOLVED IN A HEAD ON COLLISION WITH ANOTHER

1 VEHICLE. THE VEHICLE CONTINUED MOVING AND STOPPED BY COLLIDING WITH
 2 A STORE SIGN. **THE AIR BAGS DID NOT DEPLOY** AND SEAT BELTS WERE WORN . .
 3 . THE INSURANCE COMPANY DETERMINED THE VEHICLE WAS TOTALED DUE TO
 4 THE ACCIDENT. THE DEALER DOES NOT HAVE THE MEANS TO TEST FOR AIR BAG
 5 NON-DEPLOYMENT. UPDATED 1/24/2007 - *NM”

6 j. NHTSA complaint #10161658 dated Thursday, July 6, 2006, reported an
 7 accident on Saturday, June 3, 2006 involving a 1999 CHEVROLET BLAZER in Ludlow, MA.
 8 The complaint states in part: “CHEVY DRIVER HIT A CAR IN HER LANE FIRST, THEN
 9 RICOCHETED HEAD ON INTO A TREE. **NEITHER TIME DID AIRBAGS DEPLOY.**
 10 *TT”

11 k. NHTSA complaint #10163811 dated Friday, July 28, 2006, reported an
 12 accident on Thursday, July 20, 2006 involving a 2000 ISUZU RODEO in Nederland, TX. The
 13 complaint states: “A GIRL RAN A RED LIGHT AND I HIT HER IN THE PASSENGER SIDE
 14 OF HER CAR HEAD ON WITH MY 2000 ISUZU RODEO. IT WAS A FULL FRONTAL
 15 COLLISION FOR ME AND MY CHILDREN. LUCKILY, WE ARE ALWAYS BUCKLED UP
 16 BECAUSE **NONE OF MY AIRBAGS DEPLOYED AT ALL.** THE OTHER CAR WAS
 17 GOING ABOUT 60 MPH AND HER AIRBAG DEPLOYED WHEN I HIT HER BUT MINE
 18 DID NOT. LUCKILY, MY CHILDREN WERE NOT HURT BADLY BUT
 19 UNFORTUNATELY, I SUSTAINED NECK, BACK AND KNEE INJURIES. I WAS AND
 20 STILL AM VERY UPSET THAT MY AIRBAGS FAILED. EVEN THE OWNER OF THE
 21 BODY SHOP I USE WAS IN SHOCK THAT THEY DID NOT DEPLOY AS THE IMPACT
 22 WAS ENOUGH TO SPLIT THE FRAME OF MY RODEO AND TOTAL IT OUT . . . THANK
 23 YOU FOR YOUR TIME, I HOPE I CAN HELP ANOTHER FAMILY FROM GETTING
 24 INJURED.”

25 l. NHTSA complaint #10217793 dated Tuesday, February 12, 2008, reported
 26 an accident on Thursday, February 7, 2008 involving a 2006 CHEVROLET TRAILBLAZER in
 27 Lakewood, OH. The complaint states: “A 2006 CHEVY TRAILBLAZER TRAVELING OVER
 28 THE SPEED LIMIT ON MY STREET CRASHED INTO A TREE, A PARKED CAR, AND

1 THEN CONTINUED TO ROLL OVER ACROSS MY FRONT LAWN, LANDING
 2 SIDEWAYS AFTER FLIPPING SEVERAL TIMES. THE OCCUPANTS WERE SEVERELY
 3 INJURED. **NO AIRBAGS DEPLOYED DURING THE CRASH.** THE DRIVER OF THE
 4 VEHICLE IS IN ICU NEEDING FACIAL RECONSTRUCTIVE SURGERY. *TR”

5 m. NHTSA complaint #10221319 dated Saturday, March 15, 2008, reported
 6 an accident on Thursday, February 21, 2008 involving a 2005 CHEVROLET TRAILBLAZER in
 7 Clay, NY. The complaint states: “I WAS DRIVING ON A 2 LANE ROAD GOING 45MPH. A
 8 CAR WAS FOLLOWING CLOSE BEHIND ME SO I WENT TO GET INTO RIGHT LANE
 9 AND MY TRUCK DID 5 360 AND HIT 3 TREES HEAD ON AND **AIR BAG NEVER**
 10 **DEPLOYED.** *TR”

11 n. NHTSA complaint #10263896 dated Wednesday, April 1, 2009, reported
 12 an accident on Thursday, March 26, 2009 involving a 2002 CHEVROLET TRAILBLAZER in
 13 Elizabeth, NJ. The complaint states: “I WAS IN A CAR ACCIDENT, WHERE I WAS
 14 TRAVELING AT ABOUT 35 MPH. AN AGGRESSIVE DRIVER SPEED AROUND ME AND
 15 CUT ME OFF AND THAN STOMPED ON THIS BRAKES IN FRONT OF ME. DUE TO
 16 THAT I SWERVED TO MISS HIM CLIPPING HIS RIGHT BACK LIGHT AD BUMPER
 17 WITH MY LEFT HEADLIGHT AND BUMPER. AS I WAS SWERVING I HIT A TREE JUST
 18 ABOUT DEAD ON WITH MY CAR . . . I HIT THE TREE AT A SPEED OF ABOUT 28-30
 19 MPH. AFTER INITIAL IMPACT I WAS RUSHED TO THE HOSPITAL DUE TO
 20 UNCONSCIOUS AND FACIAL CONTUSIONS. DURING THE FIRST MOMENTS AFTER
 21 THE ACCIDENT, ONE OF THE FIRST THINGS OFFICERS, EMTS AND WITNESSES SAID
 22 WAS “**I CAN'T BELIEVE THE AIRBAGS DIDN'T GO OFF.**” IN THE RECENT DAYS
 23 AFTER THE ACCIDENT I HAVE HAD SEVERAL MECHANICS AND SUCH APPRAISE
 24 THE CAR, THE ONE COMMON THEME THEY ALL SHARE IS THAT THEY SUSPECT
 25 THERE MIGHT NOT BE AN AIRBAG WHERE IT BELONGS. OR THE LACK THERE OF.
 26 *TR”

27 o. NHTSA complaint #10463248 dated Wednesday, June 27, 2012, reported
 28 an accident on Friday, July 15, 2011 involving a 2005 GMC in Richmond, VA. The complaint

1 states: "THE CONTACT STATED WHILE DRIVING 55 MPH, HE CRASHED INTO A TREE.
 2 **THE AIR BAGS FAILED TO DEPLOY . . .** A POLICE REPORT WAS FILED. THE
 3 MANUFACTURER WAS MADE AWARE OF THE FAILURE; HOWEVER, THEY
 4 PROVIDED NO ASSISTANCE . . . THE CONSUMER'S VEHICLE WAS DAMAGED WHEN
 5 HE TRIED TO AVOID HITTING THE VEHICLE BY SWERVING SIDEWAYS AND
 6 SLIDING INTO THE GRASS. HE TRIED STOPPING THE VEHICLE WHILE IT WAS STILL
 7 ON THE PAVEMENT BUT HE INEVITABLY RAN INTO THE DITCH AND FLEW
 8 AIRBORNE INTO A TREE, AND THE TRUCK OVERTURNED."

9 p. NHTSA complaint #10524151 dated Wednesday, July 10, 2013, reported
 10 an accident on Thursday, May 30, 2013 involving a 2006 CHEVROLET TRAILBLAZER in
 11 Mansfield, OH. The complaint states: "THIS COMPLAINT IS BEING FILED ON BEHALF OF
 12 THE VEHICLE OWNER AND DRIVER. THIS CHEVY TRAILBLAZER WAS INVOLVED
 13 IN A TWO VEHICLE, DOUBLE FATAL CRASH. THE FRONT OF THE TRAILBLAZER
 14 STRUCK THE DRIVER'S SIDE DOOR OF A CAVALIER THAT FAILED TO YIELD FROM
 15 A STOP SIGN. THE TRAILBLAZER STAYED CONNECTED WITH THE CAVALIER,
 16 FORCING IT OFF THE LEFT SIDE OF THE ROADWAY AND INTO A LARGE TREE.
 17 BOTH OCCUPANTS IN THE CAVALIER WERE FATALLY INJURED. **THE FRONT**
 18 **AIRBAGS DID NOT DEPLOY ON THE TRAILBLAZER** AND NO EVENT WAS
 19 RECORDED ON THE AIRBAG CONTROL MODULE. *TR"

20 q. NHTSA complaint #10537593 dated Tuesday, August 27, 2013, reported
 21 an accident on Tuesday, August 13, 2013 involving a 2003 CHEVROLET BLAZER in Harrison
 22 Township, MI. The complaint states: "I WAS TRAVELING SOUTHBOUND WHEN I
 23 EXPERIENCED A SEIZURE AND LOST CONTROL OF MY VEHICLE. I PROCEEDED TO
 24 VEER TO THE LEFT WHERE I CLIPPED SEVERAL CARS THAT WERE HEADED
 25 NORTHBOUND . . . I THEN PROCEEDED OVER A TREE LAWN AND INTO A PARKING
 26 LOT. I HIT A DODGE RAM PICKUP WITH THE RIGHT FRONT CORNER OF MY
 27 VEHICLE AND PUSHED THAT VEHICLE INTO ANOTHER PARKED CAR THAT WAS
 28 NEXT TO IT. BOTH VEHICLES ENDED UP SIDEWAYS AND MY VEHICLE ENDED UP

1 SPUN AROUND 180 DEGREES . . . THE JAWS OF LIFE WERE USED TO EXTRACT ME
2 FROM MY VEHICLE. I WAS TAKEN TO A LOCAL HOSPITAL WHERE IT WAS
3 DETERMINED THAT I SUFFERED BURST FRACTURES OF L1, L2, AND L3. I ALSO
4 SUFFERED AN EVULSION FRACTURE OF MY LEFT ANKLE. THE POLICE REPORT
5 STATES THAT I WAS TRAVELLING AT A HIGH RATE OF SPEED AND THAT THE
6 VEHICLES WHICH WERE NORTHBOUND WERE JUST CLIPPED. **THE AIRBAGS ARE**
7 **BOTH STILL WITHIN THEIR CASES AS NEITHER DEPLOYED** . . . THE INSURANCE
8 INVESTIGATOR EVEN EXPRESSED TO MY WIFE THAT HE WAS SURPRISED THAT
9 THE AIR BAG DID NOT DEPLOY.”

10 r. NHTSA complaint #10550276 dated Wednesday, October 30, 2013,
11 reported an accident on Monday, October 28, 2013 involving a 2006 CHEVROLET
12 TRAILBLAZER in Neihart, MT. The complaint states: “TL* THE CONTACT OWNS A 2006
13 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING
14 APPROXIMATELY 35 MPH, SHE LOST CONTROL OF THE VEHICLE WHILE DRIVING
15 IN SNOWY WEATHER. THE VEHICLE NOSE DIVED INTO AN EMBANKMENT AND
16 THEN CRASHED INTO A BOULDER. **THE AIR BAGS FAILED TO DEPLOY.** THE
17 CONTACT WAS TRANSPORTED TO THE HOSPITAL VIA AMBULANCE FOR
18 TREATMENT OF A CONCUSSION AND BRUISING. THE FRONT PASSENGER WAS
19 ALSO INJURED AND SUSTAINED BRUISING. THE VEHICLE WAS DESTROYED. THE
20 MANUFACTURER WAS MADE AWARE OF THE FAILURE.”

21 s. NHTSA complaint #10574295 dated Sunday, March 23, 2014, reported an
22 accident on Friday, February 21, 2014 involving a 2010 GMC TERRAIN in Saint Joe, IN. The
23 complaint states: “INVOLVED IN A 21 CAR PILE UP IN THE UPPER PENINSULA DURING
24 A COMPLETE WHITE OUT. WE WERE ONLY TRAVELING APPROXIMATELY 25
25 MILES PER HOUR BUT, WE DID HAVE SERIOUS IMPACT IN THE FRONT, AFTER
26 HITTING A TRAILER AND ALSO SERIOUS IMPACT FROM BEHIND WHEN HIT BY A
27 TRUCK AND TRAILER. **NO AIRBAGS DEPLOYED.** THE TRUCK TRAVELING AHEAD
28 OF US, THAT WE HIT, THE AIRBAGS DID DEPLOY. MY FATHER AND BROTHER,

1 WHO WERE ALSO BOTH DRIVING CHEVY TRUCKS, AND ALSO HAD SERIOUS
2 FRONT END DAMAGE DURING THE SAME ACCIDENT, THEIR AIRBAGS DID NOT
3 DEPLOY EITHER. *TR”

4 t. NHTSA complaint #10576031 dated Monday, March 31, 2014, reported an
5 accident on Sunday, March 23, 2014 involving a 2012 CADILLAC SRX in Kaplan, LA. The
6 complaint states: “I FELL ASLEEP WHILE DRIVING, JUMPED A LEVEE, RAN THROUGH
7 A FENCE, AND WRECKED IN A GRASSY WATERY AREA. MY ENGINE WAS
8 SMASHED, THE MOTOR MOUNT BROKE, AND MY TIRES ARE PUSHED BACK. MY
9 **AIR BAGS DID NOT DEPLOY**. MY FACE HIT THE STEERING WHEEL AND MY NOSE
10 IS BROKEN. I WOULD LIKE TO FIND OUT IF THERE IS ANY RECALLS ON THIS CAR.

11 *TR”

12 u. NHTSA complaint #10583703 dated Saturday, April 19, 2014, reported an
13 accident on Thursday, March 13, 2014 involving a 2012 GMC TERRAIN in Moneta, VA. The
14 complaint states: “I INADVERTENTLY VEERED OFF SIDE ROADWAY, (VA HIGHWAY
15 220) COLLIDING WITH A TREE/ROADSIDE SHRUBS, ETC (WAS KNOCKED
16 UNCONSCIOUS AS FOREHEAD HIT STEERING WHEEL ON INITIAL IMPACT).
17 **AIRBAGS DID NOT DEPLOY** ALLOWING ME TO SUSTAIN A HEAD INJURY THAT
18 KNOCKED ME UNCONSCIOUS... FOREHEAD WAS GASHED WITH SIGNIFICANT
19 BLEEDING. I WAS TRANSPORTED BY AMBULANCE IN UNCONSCIOUS STATE.
20 DAMAGE TO VEHICLE IS IN EXCESS OF \$8,000 SO FAR AS VEHICLE STILL IN
21 REPAIR SHOP WITH MASSIVE FRONT END DAMAGE THAT AFFECTS STEERING
22 LINKAGE, ETC. THE IMPACT OF VEHICLE AGAINST FOLIAGE, TREES SHRUBS,
23 SHOULD HAVE FORCED AIR BAGS TO DEPLOY AND I BELIEVE THAT I WOULD NOT
24 HAVE SUSTAINED A HEAD INJURY THAT RENDERED ME UNCONSCIOUS WITH
25 MILD CONCUSSION AND COULD NOT CONTROL VEHICLE LEAVING ROADWAY.

26 *TR”

27 v. NHTSA complaint #10592423 dated Monday, May 19, 2014, reported an
28 accident on Thursday, May 8, 2014 involving a 2003 CHEVROLET SILVERADO in

1 Burtonsville, MD. The complaint states: “TRUCK COLIDED WITH GUARD RAIL.
 2 BOUNCED OFF, HIT VEHICLE 1, THEN INTO VEHICLE 2 THEN STOPPED AFTER
 3 HITTING VEHICLE 3 A SEMI TRUCK. ALL DAMAGE WAS DONE TO FRONT OF THE
 4 CHEVY SILVERADO. **AT NO TIME DID THE AIRBAGS DEPLOY.**”

5 w. NHTSA complaint #10622016 dated Wednesday, August 13, 2014,
 6 reported an accident on Saturday, August 9, 2014 involving a 2012 CHEVROLET TAHOE in
 7 The Colony, TX. The complaint states: “WHILE TURNING LEFT (TAHOE) WITH A
 8 PROTECTED GREEN ARROW AT AN X-SHAPED INTERSECTION, VEHICLE (KIA
 9 SEDAN) AT FAULT FAILED TO YIELD AND ENTERED THE INTERSECTION AT
 10 SPEEDS UPWARDS OF 40 MPH FROM THE LEFT OF THE TAHOE. FRONT-IMPACT
 11 COLLISION OCCURRED . . . TAHOE STRUCK PASSENGER SIDE OF KIA SEDAN.
 12 TRAJECTORY OF IMPACT CAUSED DIRECTIONAL CHANGES IN UPWARDS OF 90*
 13 FOR BOTH VEHICLES; THE FORCE OF THE PRIMARY ACCIDENT DESCRIBED ABOVE
 14 ALSO CAUSED MENTIONED VEHICLES TO COLLIDE WITH LEFT REAR OF ANOTHER
 15 VEHICLE (HONDA SEDAN) . . . DUE TO THE FORCE OF IMPACT, FRONT & SIDE
 16 AIRBAGS DEPLOYED ON BOTH THE KIA SEDAN AND THE HONDA SEDAN, BUT
 17 **FAILED TO DEPLOY ON THE TAHOE . . .** FORCE WAS SUCH THAT AFTER THE
 18 COLLISION, TAHOE TRANSMISSION WAS IN DRIVE, BUT REMAINED AT A
 19 COMPLETE STOP. DAMAGE SUSTAINED ON THE TAHOE INCLUDE FRONT-END
 20 BODY DAMAGE, ENGINE DAMAGE (VEHICLE REQUIRED TOWING AND WAS
 21 INOPERABLE), AND FRAME DAMAGE, AT A MINIMUM . . . MULTIPLE FIRST-
 22 RESPONDERS COMMENTED ON THE ODDITY THAT, GIVEN THE DAMAGE
 23 SUSTAINED BY THE TAHOE AND THE VELOCITY AT IMPACT, THE AIRBAGS
 24 DEPLOYED ON ALL VEHICLES BUT THE TAHOE. *TR”

25 x. NHTSA complaint #10641399 dated Saturday, October 4, 2014, reported
 26 an accident on Tuesday, June 7, 2011 involving a 2002 CHEVROLET TAHOE in Cheney, WA.
 27 The complaint states: “THE CONTACT STATED THAT WHILE THE DRIVER WAS
 28 DRIVING AT 45 MPH AND ATTEMPTED TO AVOID A CRASH WITH ANOTHER

1 VEHICLE. AS A RESULT, THE DRIVER CRASHED INTO A GUARDRAIL AND **THE AIR**
 2 **BAGS FAILED TO DEPLOY.** A POLICE REPORT WAS FILED. THE CONTACT WAS
 3 TAKEN TO A HOSPITAL AND SUSTAINED INJURIES TO THE RIBS, THE COLLAR
 4 BONES, A BRAIN TRAUMA AND A COLLAPSED LUNG. THE DRIVER SUFFERED
 5 FROM FATAL INJURIES.”

6 y. NHTSA complaint #10767586 dated Tuesday, September 22, 2015,
 7 reported an accident on Saturday, August 1, 2015 involving a 2004 CHEVROLET
 8 TRAILBLAZER in Tallahassee, FL. The complaint states: “MY MOTHER WAS INVOLVED
 9 IN A 1 CAR ACCIDENT ON BAUM RD LOCATED IN TALLAHASSEE, FL. SHE WAS THE
 10 ONLY PASSENGER DETERMINED TO BE IN THE VEHICLE AT THE TIME OF THE
 11 ACCIDENT. ACCORDING TO THE CRASH REPORT, D1 (DRIVER ONE) WAS
 12 TRAVELING WESTBOUND ON BAUM RD GOING THE NORMAL POSTED SPEED OF
 13 55MPH, WHEN SHE VEERED TOWARDS THE CENTER OF THE RD AND SUDDENLY
 14 TURNED RIGHT VEERING OF THE RIGHT SHOULDER OF THE RD AND STRIKING
 15 SEVERAL TREES ON THE DRIVERS SIDE AND FRONT END . . . WHEN I WENT TO
 16 RETRIEVE MY MOTHERS THINGS FROM HER TRAILBLAZER, I NOTICED THAT **NO**
 17 **AIR BAGS HAD DEPLOYED.** AND AS FAST AS MY MOM WAS GOING AND THE
 18 TYPE OF IMPACT & DAMAGE HER SUV SUSTAINED, I WOULD THINK AND HOPE
 19 THE AIRBAGS WOULD DEPLOY IN THIS TYPE OF ACCIDENT, THUS PREVENTING
 20 SERIOUS INJURY OR DEATH. MY MOM WAS NOT SO LUCKY, AND MYSELF AND MY
 21 FAMILY HAVE ENDURED GREAT PAIN FROM LOOSING HER SO SUDDENLY.”

22 z. NHTSA complaint #10907149 dated Friday, September 16, 2016, reported
 23 an accident on Thursday, September 1, 2016 involving a 2006 CADILLAC SRX in Happy
 24 Valley, OR. The complaint states: “THE VEHICLE HIT A CURB AND DROVE INTO A
 25 BUILDING. **THE AIR BAGS FAILED TO DEPLOY.** THE CONTACT SUSTAINED
 26 INJURIES THAT REQUIRED MEDICAL ATTENTION . . . THE MANUFACTURER WAS
 27 NOTIFIED OF THE FAILURE.”
 28

1 135. GM knew or had reason to know about these complaints, which are publicly
2 available on NHTSA's website. Indeed, many complaints explicitly state that GM was directly
3 informed of and/or investigated these suspicious accidents. For example:

4 a. A complaint about an August 2018 accident in a 2008 GMC Acadia details
5 that the airbags and seatbelt pretensioners did not deploy after the complainant's wife fell asleep
6 at the wheel and struck a utility pole and then a large dirt embankment—which caused her to “hit
7 the steering column so hard . . . it broke the column and broke her sternum,” and caused the
8 granddaughter in the passenger seat to break her back in two places. It continues that “GENERAL
9 MOTORS . . . SENT A MAN TO DOWNLOAD THE COMPUTER INFORMATION THEY
10 SENT ME A COPY OF THE INFO AND LATER CONTACTED ME SAYING THE INFO
11 SHOWED EVERYTHING WAS WORKING PROPERLY.” NHTSA complaint #11066850.

12 b. After a July 2014 head on collision at 50 MPH where the airbags did not
13 deploy in a 2007 Silverado, totaling the vehicle, another driver was “TOLD BY GM THAT
14 CRASH DID NOT MEET CRITERIA FOR DEPLOYMENT.” The driver expressed skepticism
15 about this response, and in the complaint, stated “A HEAD ON COLLISION AT 50 MPH THAT
16 TOTALED 2500 SERIES CHEVY TRUCK. HARD FOR ME TO BELIEVE . . . DO I NEED
17 TO [BE] CONCERNED?” NHTSA complaint #10608220.

18 c. Another driver reported on a May 2014 accident in a 2012 GMC Terrain in
19 Moneta, VA. The driver struck “something” head on after veering off the highway and proceeded
20 through trees and brush. They were knocked unconscious after hitting their head on the steering
21 wheel upon the first impact, as the airbags had failed to deploy. They were transported to a
22 hospital by ambulance and spent two days in inpatient care. The driver later “CONTACTED
23 GMC CORPORATE . . . TO ADVISE MY CONCERNS FOR SAFETY . . . RECEIVED A
24 FOLLOW UP TELEPHONE CALL FROM GMC REPRESENTATIVE . . . HE EXPRESSED
25 NO INTEREST IN MY COMPLAINT . . . REFUSED TO COMMENT ON MY STATEMENT
26 THAT AIR BAG FAILED TO DEPLOY RESULTING IN EXTENSIVE DAMAGE TO FRONT
27 OF VEHICLE AND SUSTAINING A HEAD INJURY AS NO BAG DEPLOYED . . . I WAS
28

1 ADVISED THAT GMC HAD NO FURTHER INTEREST IN THIS MATTER AND WOULD
2 NOT EVALUATE MY SAFETY CONCERNS.” NHTSA complaint #10588334.

3 d. After a July 2012 accident involving a 2012 GMC Terrain in San
4 Clemente, CA, in which the Terrain was hit multiple times in an intersection in the driver’s front
5 end, but no airbags deployed, resulting in whiplash and contusions to the driver, a GM
6 representative responded to a complaint lodged by the driver’s parents and stated that there was
7 “NO NEED FOR DEPLOYMENT” because it was a “LOW THRESHOLD EVENT.” NHTSA
8 complaint #10466384.

9 e. After hitting a patch of black ice at 58 MPH in a Chevrolet Silverado in
10 January 2008, another complainant described that they lost control of the vehicle, ran off the road,
11 crashed into a telephone pole and ultimately into a frozen embankment. The airbags did not
12 deploy, causing the driver to hit the steering wheel. As the complainant relates, they “FILED A
13 COMPLAINT WITH THE MANUFACTURER, BUT THE COMPLAINT WAS DENIED. THE
14 MANUFACTURER WAS UNABLE TO DIAGNOSE THE VEHICLE; HOWEVER, AFTER
15 INSPECTION OF THE VEHICLE, THE MANUFACTURER CONFIRMED THAT THE AIR
16 BAGS WERE ENABLED AT THE TIME OF IMPACT. THEY DID NOT GIVE AN
17 EXPLANATION FOR THE DEPLOYMENT FAILURE.” NHTSA complaint #10238395.

18 f. In a report about a March 2006 accident involving a 2005 Cadillac
19 Escalade in Louisville, KY, the complainant describes that after none of the airbags deployed in a
20 front end collision in their 4-week old vehicle, they “CALLED CADILLAC CUSTOMER
21 SERVICE AND WAS GIVEN AN AIRBAG HISTORY LESSON VIA TELEPHONE FROM
22 SOMEONE THAT HAD NEVER SEEN MY VEHICLE OR INSPECTED IT FOR DAMAGE
23 AFTER THE ACCIDENT. AT THE END OF OUR CONVERSATION I WAS TOLD ALL
24 WAS OK, NONE OF MY AIRBAGS SHOULD HAVE DEPLOYED AND NOT TO WORRY
25 ABOUT IT. THE ENTIRE FRONT END OF MY VEHICLE WAS KNOCKED OFF, THE
26 FRAME HAS MULTIPLE CRACKS AND IS BENT AS A RESULT OF THE COLLISION
27 AND THE COLLISION CENTER IS 90% CERTAIN THE VEHICLE IS NOT REPAIRABLE.
28 *JB” NHTSA complaint #10152376.

g. After an August 2004 accident involving a 1999 Chevrolet Astro in Norfolk, VA in which the vehicle jumped a curb, struck a fire hydrant, and then struck a tree without the airbags deploying, the driver was taken by ambulance to the hospital for head and neck injuries. After the accident, the “CONSUMER CONTACTED THE MANUFACTURER AND A REPRESENTATIVE CAME DOWN TO MEET WITH THE DEALER AND CONSUMER. THE REPRESENTATIVE INFORMED CONSUMER THAT THE VEHICLE WAS FUNCTIONING AS DESIGNED.” NHTSA complaint # 10087718.

h. Another driver contacted GM after the airbags did not deploy in a February 2004 front end collision at 25-30 MPH in their 2000 Isuzu Rodeo in Westwood, NJ. “THE CONSUMER CONTACTED THE MANUFACTURER ABOUT THE AIR BAGS BUT THE REPRESENTATIVE DID NOT SEEM TO BE TOO CONCERNED ABOUT THE SITUATION.” NHTSA complaint #10087550.

i. Another driver described a head on collision at 39 MPH in their 2002 Chevrolet Tahoe in which the airbags did not deploy and the seatbelts did not tighten. The driver hit their head on the steering wheel, knocking them unconscious. A readout from the vehicle’s computer showed the seatbelts were in working order, and GM responded by sending a representative to inspect the vehicle in person. The complainant was awaiting a response from GM at the time of the report. NHTSA complaint #10353935.

136. More than eight hundred similar complaints—i.e., frontal crashes in the Class Vehicles with airbag and seatbelt failures following multiple impacts, or, potentially long-soft frontal impacts—are attached hereto as Exhibit A.⁵³ These accidents are relevant, and suspicious, because they include hallmarks of the SDM Calibration Defect (airbag and seatbelt failures),

⁵³ The accidents in the preceding paragraph and Exhibit A include data for Class Vehicles in model years 1999-2014. In the interest of efficiency, Plaintiffs have not supplemented the accidents included in Exhibit A from the previously filed versions with their prior pleadings, but note that significant numbers of similar consumer reports of multi-impact and front-end impact accidents with airbag and seatbelt failures have continued to accrue in the NHTSA database in model years 1999-2014, as well as later model years, in the time since Exhibit A was originally prepared in 2021. Plaintiffs are prepared to submit supplemental examples of such incidents at the Court’s request.

1 under the very crash conditions where it arises, and in the specific population of vehicles
 2 Plaintiffs allege to be impacted.

3 137. In addition to these consumer complaints, a separate, public dataset from NHTSA,
 4 the Fatality Analysis Reporting System (“FARS”) provides a nationwide census of crashes that
 5 resulted in fatal injuries. While the complaints outlined above are reported to NHTSA by
 6 consumers and can include any type of complaint or incident, FARS data is reported by state
 7 agencies responsible for monitoring all qualifying fatal crashes in their states. To be included in
 8 FARS data, a crash must involve a motor vehicle traveling on a public road and result in the death
 9 of a person in one or more of the vehicles involved in the crash within 30 days of the crash. The
 10 dataset collects information on over 100 different data elements that characterize the crash, the
 11 vehicles, and the people involved—including whether or not the airbags deployed.

12 138. NHTSA’s FARS dataset also reveals a recurring pattern of suspicious
 13 nondeployments during frontal crashes (i.e., the crash dynamics that can implicate the SDM
 14 Calibration Defect) and reinforces the extremely high stakes of such incidents. From 1999 to
 15 present, FARS data reflects at least 1,946 frontal crashes where the airbags did not deploy in a
 16 Class Vehicle—1,167 of which occurred in 2009 or later, after New GM was formed. This same
 17 data reflects that at least 1,298 individual occupants (drivers or passengers) in a Class Vehicle
 18 were injured or killed in these crashes.

19 **D. Despite its knowledge, GM misrepresented and concealed important**
 20 **information about the SDM Calibration Defect and Class Vehicle safety.**

21 139. For many consumers, including Plaintiffs, safety is one of the most important
 22 factors when buying or leasing a vehicle. GM capitalized on this fact in advertising and other
 23 consumer-facing representations about the Class Vehicles and touted the safety of the Class
 24 Vehicles in national marketing campaigns.

25 140. In nationwide advertisement campaigns and promotional materials, GM
 26 maintained that the Class Vehicles were safe and reliable, and it did not correct representations
 27 about the Class Vehicles’ safety and reliability made by Old GM in the past. Instead, GM has
 28 repeatedly touted the Class Vehicles’ passenger safety systems and assured consumers they could

1 be relied upon to activate the airbags and seatbelts during a crash. These representations are false
 2 and misleading because of what they fail to say; GM uniformly failed to disclose that the SDM
 3 Calibration Defect could—at the worst possible moment—prevent the airbags and seatbelts from
 4 activating.

5 141. Plaintiffs and Class members, directly or indirectly, were exposed to these
 6 advertisements and promotional materials prior to purchasing or leasing their Class Vehicles. The
 7 misleading statements about Class Vehicles’ safety in GM’s advertisements and promotional
 8 materials, as well as GM’s omission of the truth about the SDM Calibration Defect, influenced
 9 Plaintiffs and Class members’ decisions to purchase or lease Class Vehicles. If GM had instead
 10 chosen to disclose the truth about the SDM Calibration Defect, Plaintiffs and Class members
 11 would have seen those disclosures. Indeed, Plaintiffs would have had multiple opportunities to
 12 receive information about the SDM Calibration Defect if GM chose to disclose it, including at
 13 dealerships, on GM’s website, in radio or television advertisements, brochures, press releases or
 14 in other promotional materials, as well as in news media reports that would likely follow from the
 15 revelation of a serious safety defect in millions of GM vehicles.

16 1. **Labels and window stickers on the Class Vehicles stated that they were**
 17 **equipped with working airbags and seatbelts and failed to disclose the**
 18 **SDM Calibration Defect.**

19 142. To sell vehicles in the United States, GM was required to “certify to the distributor
 20 or dealer at delivery that the vehicle or equipment complies with applicable motor vehicle safety
 21 standards prescribed” by NHTSA under Chapter 301 of Title 49 of the U.S. Code. GM “may not
 22 issue the certificate if, in exercising reasonable care,” they have “reason to know the certificate is
 23 false or misleading in a material respect.” 49 U.S.C. § 30115; *see also* 49 U.S.C. § 30112.

24 143. Because “[c]ertification of a vehicle must be shown by a label permanently fixed
 25 to the vehicle,” all Class Vehicles have a permanent label certifying compliance with the safety
 26 regulations prescribed by NHTSA. Since all the Class Vehicles are passenger vehicles, the
 27 permanent label must state: “This vehicle conforms to all applicable Federal motor vehicle safety,
 28 bumper, and theft prevention standards in effect on the date of manufacture shown above.” 49
 C.F.R. § 567.4(g)(5).

144. These labels were false and misleading because they failed to warn consumers about the risk that the SDM would fail during a frontal crash, and instead indicated that the passenger safety system would function properly. *See* 49 C.F.R. § 571.208 (S4.1.5.4, S4.1.5.5) (Federal motor vehicle safety standards requiring Occupant Restraint Systems with airbags and seatbelts).

145. Vehicle manufacturers have a duty to disclose known safety defects to the public and to NHTSA. When a vehicle manufacturer learns of a safety defect, federal law requires it to disclose the defect to NHTSA and to the owners, purchasers, and dealers of the vehicle. 49 U.S.C. § 30118(c). Indeed, GM Parent acknowledges these obligations in its public SEC filings. In its Form 10-K for fiscal year 2019, GM Parent states: “If we or NHTSA determine that either a vehicle or vehicle equipment does not comply with a safety standard or if a vehicle defect creates an unreasonable safety risk, the manufacturer is required to notify owners and provide a remedy.”

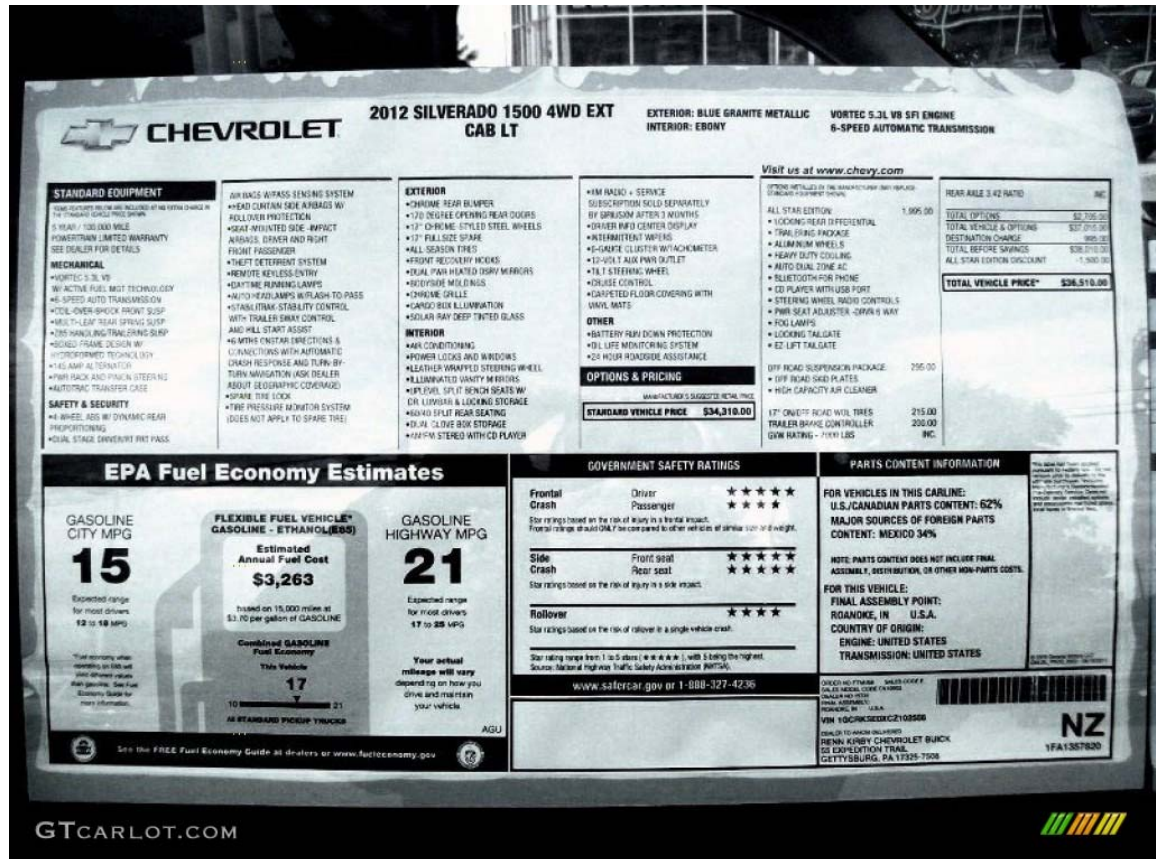
146. The interiors of the Class Vehicles also contain prominent labels that alert the driver and passengers to the vehicle’s airbag system. For example, steering wheels and passenger dashboards typically have labels identifying the airbag and safety restraint system (or “SRS”).

147. GM was also specifically required by law to include in their vehicles warning labels that alerted consumers of the need to perform airbag maintenance. For example, S4.5.1 of 49 C.F.R. § 571.208 states:

Air bag maintenance or replacement information. If the vehicle manufacturer recommends periodic maintenance or replacement of an inflatable restraint system, as that term is defined in S4.1.5.1(b) of this standard, installed in a vehicle, that vehicle shall be labeled with the recommended schedule for maintenance or replacement. The schedule shall be specified by month and year, or in terms of vehicle mileage, or by intervals measured from the date appearing on the vehicle certification label provided pursuant to 49 CFR Part 567. The label shall be permanently affixed to the vehicle within the passenger compartment and lettered in English in block capital and numerals not less than three thirty-seconds of an inch high. This label may be combined with the label required by S4.5.1(b) of this standard to appear on the sun visor.

148. Plaintiffs are unaware of any label in any Class Vehicle that alerted consumers to the SDM Calibration Defect or the need to perform maintenance to protect the SDM from preventing airbag deployment or seatbelt tightening when they are needed.

149. GM also distributed the Class Vehicles with so-called “Monroney” labels (also known as “window stickers”) that described the equipment and safety features of the vehicles, including airbags. Dealers sell Class Vehicles to consumers with these labels visible. An image of a Monroney label for the 2012 Silverado is included below as a representative example. In the center of the image, it features a “Five Star” frontal crash rating for drivers. Under “Safety & Security” features, it touts the “dual stage” airbags.



150. Monroney labels for many of the Class Vehicles are available at: <https://monroneylabels.com>. Additional exemplars of Monroney labels from some of the Class Vehicles are attached as Exhibit B. On information and belief, the original printed Monroney labels for the Class Vehicles included the same content as pertains to safety and airbags as the exemplar Monroney labels from monroneylabels.com.

151. As demonstrated by these examples, Monroney labels uniformly assured consumers that the Class Vehicles had working and safe airbags and seatbelts. This information would have suggested to any reasonable consumer that the passenger safety system did not suffer from a defect and would perform its intended function of activating the seatbelts and airbags when needed during a frontal collision.

2. **GM published owners' manuals for the Class Vehicles that detailed their safety features but did not disclose the SDM Calibration Defect.**

152. GM (and Old GM before it) published owners' manuals for each of the Class Vehicles, and distributed and made them available throughout the United States. These manuals were directed at consumers and included misleading statements regarding seatbelts, airbags, and passenger safety systems. These statements uniformly omitted any warning to consumers that the SDM could shut off too early during a crash, or that the airbags and seatbelt pretensioners may not deploy when expected.

153. Representative examples of statements from owners' manuals with materially misleading omissions concerning the effectiveness of their airbags follow in the paragraphs below.

154. The manual for the 2002 Cadillac Escalade provides extensive detail about the vehicle's airbags, including the below details and images. In addition to explaining the types of airbags and where they are located, the manual specifically alerts consumers that the airbags "are designed to inflate in moderate to severe frontal or near-frontal crashes" where "the impact speed is above the system's designed 'threshold level.'" As to frontal airbags, it explains that they have been "designed to help reduce the risk of injury from the force of an inflating airbag."

Supplemental Restraint Systems (SRS)

This part explains the frontal and side impact Supplemental Restraint Systems (SRS) or air bag systems.

Your vehicle has four air bags -- a frontal air bag for the driver, another frontal air bag for the right front passenger, a side impact air bag for the driver, and another side impact air bag for the right front passenger.

Frontal air bags are designed to help reduce the risk of injury from the force of an inflating frontal air bag. But these air bags must inflate very quickly to do their job and comply with federal regulations.

When should an air bag inflate?

The driver's and right front passenger's frontal air bags are designed to inflate in moderate to severe frontal or near-frontal crashes. But they are designed to inflate only if the impact speed is above the system's designed "threshold level."

If your vehicle goes straight into a wall that doesn't move or deform, the threshold level is about 9 to 16 mph (14 to 26 km/h). The threshold level can vary, however, with specific vehicle design, so that it can be somewhat above or below this range.

If your vehicle strikes something that will move or deform, such as a parked car, the threshold level will be higher. The driver's and right front passenger's frontal air bags are not designed to inflate in rollovers, side impacts, or rear impacts, because inflation would not help the occupant.

How the Air Bag Systems Work

Where are the air bags?



The driver's frontal air bag is in the middle of the steering wheel.



The right front passenger's frontal air bag is in the instrument panel on the passenger's side.

The driver's side impact air bag is in the side of the driver's seatback closest to the door.

How the Air Bag Systems Work

Where are the air bags?



The driver's frontal air bag is in the middle of the steering wheel.



The right front passenger's frontal air bag is in the instrument panel on the passenger's side.

The driver's side impact air bag is in the side of the driver's seatback closest to the door.

When Should an Airbag Inflate?

Frontal airbags are designed to inflate in moderate to severe frontal or near-frontal crashes to help reduce the potential for severe injuries mainly to the driver's or right front passenger's head and chest. However, they are only designed to inflate if the impact exceeds a predetermined deployment threshold. Deployment thresholds are used to predict how severe a crash is likely to be in time for the airbags to inflate and help restrain the occupants.

Whether the frontal airbags will or should deploy is not based on how fast your vehicle is traveling. It depends largely on what you hit, the direction of the impact, and how quickly your vehicle slows down.

All of the airbags in the vehicle will have the word AIRBAG embossed in the trim or on an attached label near the deployment opening.

For frontal airbags, the word AIRBAG will appear on the middle part of the steering wheel for the driver and on the instrument panel for the right front passenger.

With seat-mounted side impact airbags, the word AIRBAG will appear on the side of the seatback closest to the door.

With roof-rail airbags, the word AIRBAG will appear along the headliner or trim.

Airbags are designed to supplement the protection provided by safety belts. Even though today's airbags are also designed to help reduce the risk of injury from the force of an inflating bag, all airbags must inflate very quickly to do their job.

Airbag System

The vehicle has the following airbags:

- A frontal airbag for the driver.
- A frontal airbag for the right front passenger.
- A seat-mounted side impact airbag for the driver.
- A seat-mounted side impact airbag for the right front passenger.
- A roof-rail airbag for the driver, passenger seated directly behind the driver, and the third row outboard passenger position.
- A roof-rail airbag for the right front passenger, passenger seated directly behind the right front passenger, and the third row outboard passenger position.

155. The manuals for the 2009 Chevy Traverse and 2010 Buick Enclave include similar details and images. Like the manual for the 2002 Cadillac Escalade, they also assure consumers that the vehicle's airbags are "designed to help reduce the risk of injury from the force of an inflating bag" and, thus, that the aggressive deployment problems that plagued first-generation airbags had been alleviated. It also assures that the frontal airbags have been "designed to inflate

in moderate to severe frontal crashes to help reduce the potential for severe injuries....” It continues that airbag “deployment thresholds are used to predict how severe a crash is likely to be in time for the airbags to inflate and help restrain the occupants.” While it provides very specific detail about the way the passenger safety systems should function, the manual notably fails to say that the deployment thresholds are wholly and intentionally ignored early on into a crash sequence, preventing the airbags and seatbelts from functioning when they need to.

156. The manual for the 2014 GMC Acadia provides additional detail about how the passenger safety system functions. It explains that “Airbags are designed to inflate if the impact exceeds the specific airbag system’s deployment thresholds.” Yet again, however, the manual does not indicate that the SDM and its sensors are rendered useless in multi-impact crashes that endure for longer than a specific, aggressive cutoff imposed by GM.

Where Are the Airbags?



The driver frontal airbag is in the center of the steering wheel.



The front outboard passenger frontal airbag is in the passenger side instrument panel.



If the vehicle has a front center airbag, it is in the inboard side of the driver seatback.

When Should an Airbag Inflate?

This vehicle is equipped with airbags. See *Airbag System* on page 3-23. Airbags are designed to inflate if the impact exceeds the specific airbag system’s deployment threshold. Deployment thresholds are used to predict how severe a crash is likely to be in time for the airbags to inflate and help restrain the occupants. The vehicle has electronic sensors that help the airbag system determine the severity of the impact. Deployment thresholds can vary with specific vehicle design.

Frontal airbags are designed to inflate in moderate to severe frontal or near frontal crashes to help reduce the potential for severe injuries, mainly to the driver’s or front outboard passenger’s head and chest.

Whether the frontal airbags will or should inflate is not based primarily on how fast the vehicle is traveling.

It depends on what is hit, the direction of the impact, and how quickly the vehicle slows down.

Frontal airbags may inflate at different crash speeds depending on whether the vehicle hits an object straight on or at an angle, and whether the object is fixed or moving, rigid or deformable, narrow or wide.

Frontal airbags are not intended to inflate during vehicle rollovers, rear impacts, or many side impacts.

In addition, the vehicle has advanced technology frontal airbags. Advanced technology frontal airbags adjust the restraint according to crash severity.

The front center airbag, if equipped, is designed to inflate in moderate to severe side crashes depending upon the location of the impact, when either side of the vehicle is struck. In addition, the front center airbag is designed to inflate when the sensing system predicts that the vehicle is about to roll over on its

side. The front center airbag is not designed to inflate in frontal impacts, near frontal impacts, or rear impacts.

Seat-mounted side impact airbags are designed to inflate in moderate to severe side crashes depending on the location of the impact. Seat-mounted side impact airbags are not designed to inflate in frontal impacts, near frontal impacts, rollovers, or rear impacts.

A seat-mounted side impact airbag is designed to inflate on the side of the vehicle that is struck.

Roof-rail airbags are designed to inflate in moderate to severe side crashes depending on the location of the impact. In addition, these roof-rail airbags are designed to inflate during a rollover or in a severe frontal impact. Roof-rail airbags are not designed to inflate in rear impacts. Both roof-rail airbags will inflate when either side of the vehicle is struck, if the sensing

1 3. **GM marketed the Class Vehicles to be safe and reliable but failed to**
 2 **mention the SDM Calibration Defect.**

3 157. Like its other consumer-facing representations, GM’s advertisements for the Class
 4 Vehicles left out a crucial part of the story. By uniformly omitting any information about the
 5 SDM Calibration Defect, GM misled consumers into believing that their airbags and seatbelts
 6 would function properly in a crash, despite its knowledge to the contrary.

7 158. A 2013 press release about the 2014 Chevy Silverado 1500, GMC Sierra, and
 8 Sierra Denali 1500 is further illustrative of GM’s misleading statements about the Class Vehicles.
 9 Acknowledging that safety is “as important to truck buyers as it is to car buyers,” Gay Kent, GM
 10 general director of Vehicle Safety and Crashworthiness, stated that the “Silverado and Sierra set a
 11 benchmark for pickup truck safety by offering a full array of advanced features designed to
 12 protect occupants before, during and after a collision.” The press release noted the vehicle’s “[s]ix
 13 standard air bags and 360-degree sensor system, including dual-stage frontal air bags, head-
 14 curtain side-impact air bags with rollover protect, and front outboard seat-mounted side-impact
 15 air bags.”

16 159. Brochures and press releases for other Class Vehicles use similar language to send
 17 a misleading message of safety. Illustrative examples are listed below.

18 a. Beginning with the 1999 Chevy Blazer, GM promised to go “to the ends of
 19 the earth to bring you driving security,” assuring “peace of mind” with its “mainstay features such
 20 as Next Generation driver and right-front-passenger airbags.”

21 b. “Because safety and security are so important to your family,” the brochure
 22 for the 2002 Chevy Astro reads, “Astro features a comprehensive system to help you feel secure
 23 while you’re driving.” Among other safety features, “[s]tandard driver and front-passenger air
 24 bags . . . [are] designed to give you peace of mind. Chevy Astro. It’s the midsize van that’s
 25 serious about safety and security.”

26 c. The brochure for the 2006 GMC Yukon promises, “should the worst
 27 happen, your Yukon will protect you and your passengers with front and rear crush zones, a
 28 sturdy steel safety cage, up to four air bags and a host of other important safety features.”

1 d. The brochure for the 2008 Buick Enclave explains that “[s]afety and
2 protection were top priorities in the design of the Enclave” and touts the vehicle’s “360°
3 perimeter safety system [that] will deploy the appropriate airbags.”

4 e. Promising “[f]eelings of security and confidence,” the brochure for the
5 2009 Chevy Equinox states the vehicle’s “dual-stage frontal and head-curtain side-impact air
6 bags” helped earn it “the highest possible government rating for frontal crash tests – five stars.”

7 f. Declaring that “[s]afety never goes out of style,” the brochure for the 2009
8 Chevy Traverse highlights the vehicle’s “five-star frontal and side-impact crash test ratings” and
9 its “six air bags that help protect all three rows of seating.”

10 g. A press release for the 2009 Cadillac Escalade ESV goes further,
11 proclaiming that the “Escalade is designed to be among the industry’s safest and most secure
12 vehicles, with numerous safety systems and crash-avoidance technologies.”

13 h. “Speaking of safety,” the brochure for the 2010 Buick Enclave reads,
14 “Enclave has earned an impressive five-star crash rating for both front and side impacts
15 Five-star rating is for the driver and front passenger seating positions in the frontal crash test and
16 for the front and rear seating positions in the side-impact crash test.”

17 i. The brochure for the 2010 GMC Terrain describes the vehicle as “the state
18 of the art in air bags” and contends that “[s]egment-best safety is anticipated, with features that
19 include . . . six standard air bags: dual frontal airbags; head curtain side air bags and pelvic/thorax
20 seat-mounted side airbags.”

21 j. The brochure for the 2010 Silverado assures that the “head of security
22 never goes off the clock,” boasting of a “five-star frontal crash test rating,” including through its
23 “driver and right-front passenger dual-stage airbags.”

24 k. A press release for the 2011 Cadillac Escalade Hybrid explains, “[f]ront-
25 image airbags for the driver and passenger have been designed to protect the head during a frontal
26 crash.”

27 l. According to the brochure for the 2011 Cadillac SRX, “[p]assenger safety
28 is a primary consideration throughout the engineering process.” If an incident occurs, “the SRX

1 looks out for you and yours,” with its “six standard airbags, including advanced, frontal dual-
2 stage and seat mounted side-impact airbags for the driver and front-seat passenger, as well as
3 first- and second- row outboard head-curtain airbags.”

4 m. Describing Buick’s “holistic[]” approach to safety, the brochure for the
5 2012 Enclave proclaims, “Enclave’s approach to safety helps you and your companions feel safe
6 and secure before, during and after your travels.” Inside the vehicle, “all rows have curtain side-
7 impact air bags with rollover protection, along with driver and front-passenger side-impact and
8 dual-stage airbags.”

9 n. In a 2013 press release announcing that NHTSA gave “its highest possible
10 5-star Overall Score” to a number of Chevrolet vehicles, including the Traverse and the
11 Silverado, Kent said “We design safety and crashworthiness into our vehicles very early in
12 development.” He continued, “We are committed to offering advanced safety technologies on a
13 broad range of models All of our vehicles are designed to provide continuous protection for
14 customers before, during and after a crash.”

15 o. A press release for the 2013 Buick Enclave likewise publicized Buick’s
16 safety record: “In 2012, every Buick model was named a Top Safety Pick by the Insurance
17 Institute for Highway Safety, underscoring the brand’s commitment to safety leadership. The
18 2013 builds on that distinction with the industry’s first front center side air bag – a standard
19 feature.”

20 p. “With head curtain side-impact air bags reaching from the front to the third
21 row of seating for outboard passengers,” the 2014 brochure for the GMC Yukon XL reads,
22 “Yukon is engineered to help protect passengers regardless of where they’re seated.”

23 q. Claiming to “set[] the standard . . . in everything from safety to
24 performance,” the brochure for the 2014 Cadillac Escalade touts the vehicle’s “eight standard
25 airbags,” including “[d]ual-stage driver and front passenger, front-impact, Automatic Occupant
26 Sensing System, driver and front passenger seat-mounted side-impact airbags for thorax and
27 pelvic protection and head-curtain side-impact airbags with rollover protection for all outboard
28 passenger rows.”

r. The brochure for the 2014 Buick Enclave promises that the vehicle has “your back, front and sides, proclaiming that “in an industry first, the standard driver’s seat side-mounted front center air bag adds another layer of protection by providing cushioning between you and your front passenger to help reduce injuries in side impacts.” The brochure includes the below picture, indicating that the airbags will function as expected.



160. Based on information and belief, every single Class Vehicle advertisement omitted any mention that the vehicles’ airbags and seatbelts could fail in a serious frontal collision due to the SDM Calibration Defect.

4. GM provided warranties to repair defects in the Class Vehicles and have not done so.

161. Plaintiffs and each Class member have had sufficient direct dealings with either Defendants or their agents (including dealerships) to establish privity of contract between Defendants, on the one hand, and Plaintiffs and each Class member, on the other hand, as to the implied warranties described in the Claims for Relief below.

162. Nonetheless, privity is not required here because Plaintiffs and each Class member are intended third-party beneficiaries of contracts between Defendants and their dealers, and of their implied warranties. The dealers were not intended to be the ultimate consumers of the Class Vehicles and have no rights under the warranty agreements provided with the Class Vehicles; the warranty agreements were designed for and intended to benefit consumers only. Finally, privity is also not required because the Class Vehicles are dangerous instrumentalities due to the safety defect in the SDM Calibration.

* * *

163. GM's deceptive actions harmed Plaintiffs and the Class. As a result of GM's unfair, deceptive, and/or fraudulent business practices, and failure to disclose that the Class Vehicles carried a dangerous safety defect that would cause the passenger safety systems to shut off during certain types of accidents, owners and lessees of the Class Vehicles have lost money and/or property.

V. CLASS ACTION ALLEGATIONS

164. This case is about GM's legal responsibility for its knowledge, conduct, and products. The proposed Class members' claims all derive directly from a single course of conduct by GM. The objective facts are the same for all Class members. Within each Count asserted by Plaintiffs on behalf of themselves and the proposed Class, the same legal standards govern.

165. Accordingly, Plaintiffs bring this lawsuit as a class action on their own behalf, and on behalf of all other persons similarly situated, as members of the proposed Class pursuant to Federal Rules of Civil Procedure 23(a), (b)(2), and/or (b)(3), and/or (c)(4). This action satisfies the numerosity, commonality, typicality, adequacy, predominance, and superiority requirements of those provisions. Certification of Plaintiffs' claims for class-wide treatment is appropriate because Plaintiffs can prove the elements of the claims on a class-wide basis using the same evidence as would be used in individual actions alleging the same claims.

A. The Class Definition

166. The "Class Vehicles" herein include all vehicles in the United States that contain the SDM Calibration Defect that were (1) manufactured, sold, distributed, or leased by Defendants or (2) manufactured, sold, distributed, or leased by Old GM and purchased or leased by Plaintiffs or a Class member after July 10, 2009.

167. The SDM Calibration Defect exists in all GM trucks and SUVs starting with model year 1999. This would include, for example, trucks and SUVs such as the Silverado, Tahoe, Astro, and Trailblazer. The information presently available to Plaintiffs shows that, after it was introduced in or about 1999, GM continued to implement its defective cutoff strategy in software used in GM SUVs through model year 2018. Discovery will reveal when, if ever, GM

1 discontinued use of the SDM Calibration Defect in its trucks and SUVs. This information is
 2 uniquely in the Defendants' hands, as only GM (and Delco, n/k/a Aptiv) possess the software
 3 calibration files for GM vehicles that will demonstrate the presence of the defect in the software;
 4 these files are not downloadable or otherwise accessible from the vehicles themselves, meaning
 5 Plaintiffs are unable to obtain those files on their own.

6 168. The proposed Class includes all persons and entities that purchased or leased a
 7 Class Vehicle in the state of California.

8 169. Excluded from the Class are:

9 a. Defendants' officers, directors and employees; Defendants' affiliates and
 10 affiliates' officers, directors, and employees; Defendants' distributors and distributors' officers,
 11 directors, and employees; and

12 b. Judicial officers and their immediate family members and associated court
 13 staff assigned to this case.

14 170. Certification of Plaintiffs' claims for class-wide treatment is appropriate because
 15 Plaintiffs can prove the elements of their claims on a class-wide basis using the same evidence as
 16 would be used in individual actions alleging the same claims.

17 171. Plaintiffs reserve the right to amend the Class definitions if discovery and further
 18 investigation reveal that any Class should be expanded, reduced, divided into additional
 19 subclasses under Rule 23(c)(5), or otherwise modified.

20 **B. Numerosity: Federal Rule of Civil Procedure 23(a)(1)**

21 172. The members of the Class are so numerous and geographically dispersed that
 22 individual joinder of all Class members is impracticable. There are millions of Class Vehicles
 23 nationwide, a significant number of which are in the state of California. The precise number and
 24 identities of the California Class members may be ascertained from Defendants' records and
 25 motor vehicle regulatory data. Class members may be notified of the pendency of this action by
 26 recognized, Court-approved notice dissemination methods.

1 C. **Commonality and Predominance: Federal Rule of Civil Procedure 23(a)(2)**
 2 **and 23(b)(3)**

3 173. This action involves common questions of law and fact, which predominate over
 4 any questions affecting individual Class members. These include, without limitation, the
 5 following:

- 6 a. Whether the Class Vehicles' SDM software calibration is defective, as
 7 described herein;
- 8 b. Whether Defendants knew, or should have known, about the SDM
 9 Calibration Defect, and, if so, how long they have or should have known about it;
- 10 c. Whether Defendants had a duty to disclose the defective nature of the Class
 11 Vehicles to Plaintiffs and Class members;
- 12 d. Whether Defendants' concealment of the SDM Calibration Defect caused
 13 Plaintiffs and Class members to act to their detriment by purchasing or leasing the Class Vehicles;
- 14 e. Whether Defendants' certifications concerning vehicle safety were
 15 misleading considering the risk that the SDMs will not trigger airbags and seatbelts during certain
 16 types of collisions;
- 17 f. Whether Defendants' conduct tolls any or all applicable limitations periods
 18 by acts of fraudulent concealment, application of the discovery rule, or equitable estoppel;
- 19 g. Whether Defendants misrepresented that the Class Vehicles were safe;
- 20 h. Whether Defendants concealed the SDM Calibration Defect;
- 21 i. Whether Defendants' statements, concealments, and omissions regarding
 22 the Class Vehicles were material, in that a reasonable consumer could consider them important in
 23 purchasing, leasing, selling, maintaining, or operating such vehicles;
- 24 j. Whether Defendants engaged in unfair, deceptive, unlawful, and/or
 25 fraudulent acts or practices, in trade or commerce, by failing to disclose that the Class Vehicles
 26 were designed, manufactured, sold, and leased with defective airbag components;
- 27 k. Whether the Class Vehicles were unfit for the ordinary purposes for which
 28 they were used, in violation of the implied warranty of merchantability;

1 l. Whether Defendants' concealment of the true defective nature of the Class
 2 Vehicles caused their market price to incorporate a premium reflecting the assumption by
 3 consumers that the Class Vehicles were equipped with fully functional passenger safety systems
 4 and, if so, the market value of that premium; and

5 m. Whether Plaintiffs and the other Class members are entitled to damages
 6 and other monetary relief and, if so, in what amount.

7 **D. Typicality: Federal Rule of Civil Procedure 23(a)(3)**

8 174. Plaintiffs' claims are typical of the claims of Class members whom they seek to
 9 represent under Fed. R. Civ. P. 23(a)(3), because Plaintiffs and each Class member purchased or
 10 leased a Class Vehicle and were comparably injured through Defendants' wrongful conduct as
 11 described above. Plaintiffs and the other Class members suffered damages as a direct proximate
 12 result of the same wrongful practices by Defendants. Plaintiffs' claims arise from the same
 13 practices and courses of conduct that give rise to the claims of the other Class members.
 14 Plaintiffs' claims are based upon the same legal theories as the claims of the other Class
 15 members.

16 **E. Adequacy: Federal Rule of Civil Procedure 23(a)(4)**

17 175. Plaintiffs will fairly and adequately represent and protect the interests of the Class
 18 members as required by Fed. R. Civ. P. 23(a)(4). Plaintiffs' interests do not conflict with the
 19 interests of the Class members. Plaintiffs have retained counsel competent and experienced in
 20 complex class action litigation, including automobile defect litigation and other consumer
 21 protection litigation. Plaintiffs intend to prosecute this action vigorously. Neither Plaintiffs nor
 22 their counsel have interests that conflict with the interests of the other Class members. Therefore,
 23 the interests of the Class members will be fairly and adequately protected.

24 **F. Declaratory and Injunctive Relief: Federal Rule of Civil Procedure 23(b)(2)**

25 176. Defendants have acted or refused to act on grounds generally applicable to
 26 Plaintiffs and the other members of the Class, thereby making appropriate final injunctive relief
 27 and declaratory relief, as described below, with respect to the Class as a whole.
 28

1 **G. Superiority: Federal Rule of Civil Procedure 23(b)(3)**

2 177. A class action is superior to any other available means for the fair and efficient
3 adjudication of this controversy, and no unusual difficulties are likely to be encountered in its
4 management. The damages or other financial detriment suffered by Plaintiffs and the other Class
5 members are relatively small compared to the burden and expense that would be required to
6 individually litigate their claims against Defendants such that it would be impracticable for
7 members of the Class to individually seek redress for Defendants' wrongful conduct.

8 178. Even if Class members could afford individual litigation, the court system could
9 not. Individualized litigation creates a potential for inconsistent or contradictory judgments and
10 increases the delay and expense to all parties and the court system. By contrast, the class action
11 device presents far fewer management difficulties and provides the benefits of single
12 adjudication, economy of scale, and comprehensive supervision by a single court.

13 **VI. ANY APPLICABLE STATUTES OF LIMITATION ARE TOLLED**

14 179. Defendants have known of the SDM Calibration Defect since at least 2009, when
15 GM learned, through books, records, and personnel, that Old GM had launched the defective
16 calibration strategy despite clear warnings of the risk of doing so, and then continued to use that
17 defective software strategy thereafter. They obtained further knowledge of the risks of the SDM
18 Calibration Defect from lawsuits and multiple suspicious accidents (involving airbag and seatbelt
19 failures in frontal accidents) occurring in practically every year since, which provided additional
20 and confirmatory notice of the continued risks of the SDM Calibration Defect.

21 180. GM had a duty to disclose the SDM Calibration Defect to consumers and NHTSA.
22 Instead, GM knowingly, affirmatively, and actively concealed the defect from regulators and
23 consumers by continuing to distribute, sell, and/or lease the Class Vehicles to Plaintiffs and the
24 Class members; to advertise the safety of the Class Vehicles; and to fail to notify regulators or
25 Plaintiffs and the Class members about the true nature of the Class Vehicles.

26 181. As of the date of this Complaint, GM still has not disclosed, and continues to
27 conceal, that the Class Vehicles are defective, that the SDM Calibration Defect could prevent the
28 airbags and seatbelts from activating during certain kinds of frontal collisions, and that these

1 Class Vehicles' safety systems may fail them in life-threatening collisions. Despite its knowledge
2 of the SDM Calibration Defect and its attendant safety risks, GM continues to market the Class
3 Vehicles based on superior safety and reliability while omitting the disclosure safety and
4 reliability risks associated with the SDM Calibration Defect.

5 182. Plaintiffs and members of the proposed Class could not have discovered through
6 the exercise of reasonable diligence that GM was concealing the SDM Calibration Defect in their
7 vehicles and misrepresenting the defective nature of the Class Vehicles.

8 183. With respect to Class Vehicles that have not experienced airbags or seatbelt
9 failure, Plaintiffs and other Class members did not discover, could not reasonably have
10 discovered, and had no reason to suspect that their Class Vehicles are defective, that GM
11 calibrated the software program that controls the SDM to prematurely cutoff airbag and seatbelt
12 deployment after a crash has begun, that—in affirmatively blocking these critical safety features
13 too early—GM significantly and unnecessarily increased the risk of injury and death in frontal
14 crashes, that the safety of their Class Vehicles is impaired by this defect such that the Class
15 Vehicles' safety system may fail them in potentially deadly collisions, or that, as a result of the
16 foregoing, they overpaid for their vehicles, and/or the value of their vehicles is diminished.

17 184. With respect to Class Vehicles that have experienced airbag and/or seatbelt failure
18 prior to the filing of this Complaint, Class members did not discover and could not reasonably
19 have discovered that such failure was due to a defect known to GM through a dangerous and
20 defective approach to SDM software calibration.

21 185. Plaintiffs and other Class members did not discover, and did not know of, facts
22 that would have caused a reasonable person to suspect that GM did not report this material
23 information within their knowledge to consumers, dealerships, or relevant authorities; nor would
24 a reasonable and diligent investigation have disclosed that GM was aware of the defective nature
25 of the SDM software calibration and the Class Vehicles in which it was incorporated.

26 186. Due to the highly technical nature of the SDM Calibration Defect, Plaintiffs and
27 Class members were unable to independently discover it using reasonable diligence. Absent
28 counsel and third-party consultants with relevant expertise, Plaintiffs and Class members lack the

1 necessary expertise to analyze the software algorithm for the SDMs, or vehicle safety system
 2 performance in an accident, and to understand its defective nature. GM has not issued a recall or
 3 issued other similar public statements about the SDM Calibration Defect, and Plaintiffs first
 4 learned of the defective nature of the SDM software calibration in their vehicles, and of GM's
 5 scheme to design and sell vehicles with defective SDM software calibrations, only in connection
 6 with retaining counsel and filing this lawsuit in 2021 (for Plaintiff Vargas and Milstead). Plaintiff
 7 Ray learned of the SDM Calibration Defect in connection with retention of counsel in late 2020,
 8 and was also aware of the pendency of this putative class action before filing his claims.

9 187. For the foregoing reasons, GM is estopped from relying on any statutes of
 10 limitation or repose as a defense in this action. All applicable statutes of limitation and repose
 11 have been tolled by operation of the discovery rule and by GM's fraudulent concealment with
 12 respect to all claims against GM.

13 **VII. CAUSES OF ACTION**

14 **COUNT I:** 15 **FRAUD BY CONCEALMENT** 16 **(Common Law)**

17 188. Plaintiffs re-allege and incorporate by reference all paragraphs as though fully set
 18 forth herein.

19 189. Plaintiffs bring this claim against all Defendants on behalf of themselves and the
 20 California State Class under the common law of fraudulent concealment.

21 190. Defendants are liable for both fraudulent concealment and non-disclosure. *See,*
 22 *e.g.*, Restatement (Second) of Torts §§ 550-51 (1977).

23 191. Defendants intentionally and knowingly concealed and suppressed material facts
 24 from regulators and consumers regarding the SDM Calibration Defect that causes the airbags and
 25 seatbelts to fail in prolonged onset, complex, or otherwise multi-impact accidents, causing a
 26 serious risk of injury or death.

27 192. A reasonable consumer would not have expected that the Class Vehicles contained
 28 a software program that was calibrated to prevent seatbelt tightening and airbag deployment

1 during certain types of frontal crashes that are otherwise severe enough to require them.

2 Defendants knew that reasonable consumers expect that their vehicle has working airbags and
3 seatbelt pretensioners and would rely on those facts in deciding whether to purchase, lease, or
4 retain a new or used motor vehicle. Whether a manufacturer's products are safe and reliable, and
5 whether that manufacturer stands behind its products, are material concerns to a consumer.

6 193. Defendants ensured that Plaintiffs and the Class did not discover this information
7 by actively concealing and misrepresenting the true nature of the Class Vehicles' safety systems.
8 Defendants intended for Plaintiffs and the Class to rely on their omissions—which they did by
9 purchasing and leasing the Class Vehicles at the prices they paid.

10 194. Defendants had a duty to disclose the SDM Calibration Defect because:

11 a. GM had exclusive and/or far superior knowledge and access to the facts
12 about this hidden and complex safety defect. Defendants also knew that these technical facts were
13 not known to or reasonably discoverable by Plaintiffs and the Class; GM knew the SDM
14 Calibration Defect (and its safety risks) was a material fact that would affect Plaintiffs' or Class
15 members' decisions to buy or lease Class Vehicles; GM is subject to statutory duties to disclose
16 known safety defects to consumers and to NHTSA; GM's actions to avoid investigations and a
17 recall due to the defect deprived consumers of an opportunity in which they could have learned
18 about it; and GM made incomplete representations about the safety and reliability of the Class
19 Vehicles and their passenger safety systems, while purposefully withholding material facts about
20 a known safety defect. In uniform advertising and materials provided with each Class Vehicle,
21 Defendants intentionally concealed, suppressed, and failed to disclose to Plaintiffs and the Class
22 that the Class Vehicles contained the dangerous SDM Calibration Defect. Because they
23 volunteered to provide information about the Class Vehicles that they offered for sale to Plaintiffs
24 and the Class, Defendants had the duty to disclose the whole truth. They did not.

25 195. To this day, Defendants have not made full and adequate disclosure and continue
26 to conceal material information regarding the SDM Calibration Defect. The omitted and
27 concealed facts were material because a reasonable person would find them important in
28

1 purchasing, leasing, or retaining a new or used motor vehicle, and because they directly impact
2 the value of the Class Vehicles purchased or leased by Plaintiffs and the Class.

3 196. Defendants actively concealed or suppressed these material facts, in whole or in
4 part, to maintain a market for their vehicles, to protect profits, and to avoid costly recalls that
5 would hurt the GM brand's image. They did so at the expense of Plaintiffs and the Class. Had
6 they been aware of the SDM Calibration Defect in the Class Vehicles, and Defendants' callous
7 disregard for safety, Plaintiffs and the Class either would not have paid as much as they did for
8 their Class Vehicles, or they would not have purchased or leased them.

9 197. Accordingly, Defendants are liable to Plaintiffs and the Class for their damages in
10 an amount to be proven at trial, including, but not limited to, their lost overpayment for the Class
11 Vehicles at the time of purchase or lease.

12 198. Defendants' acts were done maliciously, oppressively, deliberately, with intent to
13 defraud; in reckless disregard of Plaintiffs' and the Class' rights and well-being; and to enrich
14 themselves. Their misconduct warrants an assessment of punitive damages in an amount
15 sufficient to deter such conduct in the future, which amount shall be determined according to
16 proof at trial.

17 **COUNT II:**
18 **UNJUST ENRICHMENT**
19 **(Common Law)**

20 199. Plaintiffs re-allege and incorporate by reference all paragraphs as though fully set
21 forth herein.

22 200. Plaintiffs Richard Vargas and Arthur Ray assert this Unjust Enrichment count on
23 behalf of themselves and the California State Class.

24 201. By reason of their conduct, Defendants caused damages to Plaintiffs and Class
25 members. Plaintiffs and Class members conferred a benefit on the Defendants by overpaying for
26 Class Vehicles at prices that were artificially inflated by Defendants' concealment of the SDM
27 Calibration Defect and misrepresentations regarding the Class Vehicles' safety.
28

202. As a result of Defendants' fraud and deception, Plaintiffs and Class members were not aware of the true facts concerning the Class Vehicles and did not benefit from the Defendants' misconduct.

203. Defendants knowingly benefitted from their unjust conduct. They sold and leased Class Vehicles equipped with the SDM Calibration Defect for more than what the vehicles were worth, at the expense of Plaintiffs and Class members.

204. Defendants readily accepted and retained these benefits from Plaintiffs and Class members.

205. It is inequitable and unconscionable for Defendants to retain these benefits because they misrepresented that the Class Vehicles were safe, and intentionally concealed, suppressed, and failed to disclose the SDM Calibration Defect to consumers. Plaintiffs and Class members would not have purchased or leased the Class Vehicles or would have paid less for them, had Defendants not concealed the SDM Calibration Defect.

206. Plaintiffs and Class members do not have an adequate remedy at law.

207. Equity cannot in good conscience permit the Defendants to retain the benefits that they derived from Plaintiffs and Class members through unjust and unlawful acts, and therefore restitution or disgorgement of the amount of the Defendants' unjust enrichment is necessary.

COUNT III:

Violation of California Consumers Legal Remedies Act Cal. Civ. Code § 1750, *et seq.*

208. Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

209. Plaintiffs bring this claim on behalf of themselves and the California State Class against the Defendants.

210. Plaintiffs and California State Class members are "consumers" within the meaning of Cal. Civ. Code § 1761(d).

211. Defendants, the California Plaintiffs, and California State Class members are "persons" within the meaning of Cal. Civ. Code § 1761(c).

1 212. The Class Vehicles are “goods” within the meaning of Cal. Civ. Code § 1761(a).

2 213. The California Legal Remedies Act (“CLRA”) prohibits “unfair methods of
3 competition and unfair or deceptive acts or practices undertaken by any person in a transaction
4 intended to result or that results in the sale or lease of goods or services to any consumer[.]” Cal.
5 Civ. Code § 1770.

6 214. Defendants engaged in unfair or deceptive acts or practices when, in the course of
7 their business they, among other acts and practices, intentionally and knowingly made materially
8 false representations regarding the reliability, safety, and performance of the Class Vehicles
9 and/or the defective SDM software calibration, as detailed above.

10 215. Specifically, by misrepresenting the Class Vehicles as safe and/or free from
11 defects, and by failing to disclose and actively concealing the dangers and risk posed by the Class
12 Vehicles, Defendants engaged in one or more of the following unfair or deceptive business
13 practices as defined in Cal. Civ. Code § 1770(a):

- 14 a. Representing that the Class Vehicles have characteristics, uses, benefits, and qualities
15 which they do not have.
- 16 b. Representing that the Class Vehicles are of a particular standard, quality, and grade
17 when they are not.
- 18 c. Advertising the Class Vehicles and/or with the intent not to sell or lease them as
19 advertised.
- 20 d. Representing that the subject of a transaction has been supplied in accordance with a
21 previous representation when it has not.

22 Cal. Civ. Code §§ 1770(a)(5), (7), (9), and (16).

23 216. Additionally, in the various channels of information through which Defendants
24 sold and marketed Class Vehicles, Defendants failed to disclose material information concerning
25 the Class Vehicles, which they had a duty to disclose. Defendants had a duty to disclose the
26 defect because, as detailed above: (a) Defendants knew about the defect in the SDM software
27 calibration in the Class Vehicles; (b) Defendants had exclusive knowledge of material facts not
28 known to the general public or the other California State Class members; (c) Defendants actively

1 concealed material facts concerning the software calibration from the general public and Plaintiffs
2 and California State Class members; and (d) Defendants made partial representations about the
3 Class Vehicles that were misleading because they did not disclose the full truth.

4 217. Defendants' unfair or deceptive acts or practices, including their
5 misrepresentations, concealments, omissions, and/or suppressions of material facts, had a
6 tendency or capacity to mislead and create a false impression in consumers, and were likely to
7 and did in fact deceive reasonable consumers, including Plaintiffs and California State Class
8 members, about the true safety and reliability of Class Vehicles, the quality of the Class Vehicles,
9 and the true value of the Class Vehicles.

10 218. Plaintiffs and the other California State Class members have suffered injury in fact
11 and actual damages resulting from Defendants' material omissions.

12 219. Defendants' violations present a continuing risk to Plaintiffs and California State
13 Class members, as well as to the general public, and therefore affect the public interest.

14 220. Defendants are on notice of the issues raised in this count and this Complaint by
15 way of, among other things, the individual personal injury litigation and hundreds of public
16 consumer complaints detailed above, as well as their own intrinsic knowledge of defect they have
17 included in the Class Vehicles by design. Plaintiffs also sent a notice letter to Defendants in
18 accordance with Cal. Civ. Code § 1782(a) of the CLRA, notifying Defendants of their alleged
19 violations of Cal. Civ. Code § 1770(a) and demanding that Defendants correct or agree to correct
20 the actions described therein within thirty (30) days of the notice letter. Defendants did not
21 correct or agree to correct their actions within thirty days, and Plaintiffs therefore seek
22 compensatory and monetary damages to which Plaintiffs and California Class Members are
23 entitled under the CLRA.

24 221. Attached hereto as Exhibit C is the venue affidavit required by CLRA, Cal. Civ.
25 Code § 1780(d).

COUNT IV:
Violations of the California Unfair Competition Law
Cal. Bus. & Prof. Code § 17200, et seq.

222. Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

223. Plaintiffs bring this claim on behalf of themselves and the California State Class against the Defendants.

224. The California Unfair Competition Law (“UCL”), Cal. Bus. and Prof. Code § 17200, prohibits any “unlawful, unfair, or fraudulent business act or practices.”

225. Defendants’ knowing and intentional conduct described in this Complaint constitutes unlawful, fraudulent, and unfair business acts and practices in violation of the UCL. Specifically, Defendants’ conduct is unlawful, fraudulent, and unfair in at least the following ways:

a. by knowingly and intentionally concealing from Plaintiffs and California State Class members that the Class Vehicles suffer from the SDM Calibration Defect while obtaining money from the California State Class members;

b. by marketing Class Vehicles as possessing a functional, safe, and defect-free passenger safety system;

c. by purposefully designing and manufacturing the Class Vehicles to contain a defective SDM software calibration that causes airbags and seatbelts to fail in certain accidents contrary to what was disclosed to regulators and represented to consumers who purchased or leased Class Vehicles, and failing to fix the SDM Calibration Defect free of charge; and

d. by violating the other California laws alleged herein, including the False Advertising Law, Consumers Legal Remedies Act, California Commercial Code, and Song-Beverly Consumer Warranty Act.

226. Defendants’ misrepresentations, omissions, and concealment were material to the California Plaintiffs and California State Class members, and Defendants misrepresented, concealed, or failed to disclose the truth with the intention that consumers would rely on the misrepresentations, concealment, and omissions.

227. Defendants' material misrepresentations and omissions alleged herein caused Plaintiffs and the California State Class members to make their purchases or leases of their Class Vehicles. Absent those misrepresentations and omissions, Plaintiffs and California State Class members would not have purchased or leased these vehicles or would not have purchased or leased these Class Vehicles at the prices they paid.

228. Accordingly, Plaintiffs and California State Class members have suffered ascertainable loss and actual damages as a direct and proximate result of Defendants' misrepresentations and their concealment of and failure to disclose material information.

229. Defendants' violations present a continuing risk to Plaintiffs and California State Class members, as well as to the general public. Defendants' unlawful acts and practices complained of herein affect the public interest.

230. Plaintiffs request that this Court enter an order enjoining Defendants from continuing their unfair, unlawful, and/or deceptive practices and restoring to members of the California State Class any money Defendants acquired by unfair competition, including restitution and/or restitutionary disgorgement, as provided in Cal. Bus. & Prof. Code § 17203 and Cal. Bus. & Prof. Code § 3345, and for such other relief set forth below.

COUNT V:
Violations of the California False Advertising Law
Cal. Bus. & Prof. Code § 17500, *et seq.*

231. Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

232. Plaintiffs bring this claim on behalf of themselves and the California State Class against the Defendants.

233. The California False Advertising Law ("FAL"), Cal. Bus. & Prof. Code § 17500, prohibits false advertising.

234. Defendants, Plaintiffs, and California State Class members are "persons" within the meaning of Cal. Bus. & Prof. Code § 17506.

235. Defendants violated the FAL by causing to be made or disseminated through California and the United States, through advertising, marketing and other publications,

1 statements regarding the safety of the Class Vehicles that were untrue or misleading, and which
2 were known, or which by the exercise of reasonable care should have been known to Defendants,
3 to be untrue and misleading to consumers, including California State Class members. Numerous
4 examples of these statements and advertisements appear in the preceding paragraphs throughout
5 this Complaint and in Exhibit B.

6 236. The misrepresentations and omissions regarding the reliability and safety of Class
7 Vehicles as set forth in this Complaint were material and had a tendency or capacity to mislead
8 and create a false impression in consumers, and were likely to and did in fact deceive reasonable
9 consumers, including Plaintiffs and California State Class members, about the true safety and
10 reliability of Class Vehicles, the quality of the Defendants' brands, and the true value of the Class
11 Vehicles.

12 237. In purchasing or leasing their Class Vehicles, the California State Class members
13 relied on the misrepresentations and/or omissions of Defendants with respect to the safety and
14 reliability of the Class Vehicles. Defendants' representations turned out not to be true because the
15 Class Vehicles are distributed with a dangerous safety defect, rendering the vehicles' airbags and
16 seatbelts inoperative in certain types of accidents.

17 238. Plaintiffs and the other California State Class members have suffered an injury in
18 fact, including the loss of money or property, as a result of Defendants' unfair, unlawful, and/or
19 deceptive practices. Had they known the truth, Plaintiffs and California State Class members
20 would not have purchased or leased the Class Vehicles or would have paid significantly less for
21 them.

22 239. Plaintiffs and California State Class members had no way of discerning that
23 Defendants' representations were false and misleading, or otherwise learning the facts that
24 Defendants had concealed or failed to disclose. Plaintiffs and California State Class members did
25 not, and could not, unravel Defendants' deception on their own.

26 240. Defendants had an ongoing duty to Plaintiffs and California State Class members
27 to refrain from unfair or deceptive practices under the California False Advertising Law in the
28 course of their business. Specifically, the Defendants owed Plaintiffs and California State Class

1 members a duty to disclose all the material facts concerning the SDM Calibration Defect in the
 2 Class Vehicles because they possessed exclusive knowledge, they intentionally concealed the
 3 defect from Plaintiffs and California State Class members, and/or they made misrepresentations
 4 that were misleading because they were contradicted by withheld facts.

5 241. All of the wrongful conduct alleged herein occurred, and continues to occur, in the
 6 conduct of Defendants' business. Defendants' wrongful conduct is part of a pattern or generalized
 7 course of conduct that is still perpetuated and repeated, both in the State of California and
 8 nationwide.

9 242. Defendants' violations present a continuing risk to Plaintiffs and California State
 10 Class members, as well as to the general public. Defendants' unlawful acts and practices
 11 complained of herein affect the public interest.

12 243. Plaintiffs request that this Court enter an order enjoining Defendants from
 13 continuing their unfair, unlawful, and/or deceptive practices and restoring to the California State
 14 Class any money Defendants acquired by unfair competition, including restitution and/or
 15 restitutionary disgorgement, and for such other relief set forth below.

16 **COUNT VI:**
 17 **Breach of Implied Warranty of Merchantability**
 18 **Cal. Com. Code §§ 2314 and 10212**

19 244. Plaintiffs re-allege and incorporate by reference all preceding allegations as though
 20 fully set forth herein.

21 245. Plaintiffs bring this claim on behalf of themselves and the California State Class
 22 against the Defendants.

23 246. Defendants are and were at all relevant times "merchant[s]" with respect to motor
 24 vehicles under Cal. Com. Code §§ 2104(1) and 10103(c), and "sellers" of motor vehicles under
 25 § 2103(1)(d).

26 247. With respect to leases, Defendants are and were at all relevant times "lessors" of
 27 motor vehicles under Cal. Com. Code § 10103(a)(16).

28 248. All California State Class members who purchased Class Vehicles in California
 are "buyers" within the meaning of Cal. Com. Code § 2103(1)(a).

249. All California State Class members who leased Class Vehicles in the California are “lessees” within the meaning of Cal. Com. Code § 10103(a)(14).

250. The Class Vehicles are and were at all relevant times “goods” within the meaning of Cal. Com. Code §§ 2105(1) and 10103(a)(8).

251. A warranty that the Class Vehicles were in merchantable condition and fit for the ordinary purpose for which vehicles are used is implied by law pursuant to Cal. Com. Code §§ 2314 and 10212.

252. The Class Vehicles did not comply with the implied warranty of merchantability because, at the time of sale and at all times thereafter, they were defective and not in merchantable condition, would not pass without objection in the trade, and were not fit for the ordinary purpose for which vehicles were used. Specifically, the Class Vehicles suffer from the SDM Calibration Defect, which may cause the airbags and seatbelt to fail to deploy during an accident, rendering the Class Vehicles inherently defective and dangerous.

253. Defendants were on reasonable notice of these issues and an opportunity to cure the breaches due to their extensive knowledge of the SDM Calibration Defect, as detailed herein. Defendants have not cured the breaches of their warranties despite years of knowledge of those breaches.

254. As a direct and proximate result of Defendants' breach of the implied warranty of merchantability, Plaintiffs and California State Class members have been damaged in an amount to be proven at trial.

**COUNT VII:
Violation of Song-Beverly Consumer Warranty Act,
Breach of Implied Warranty
Cal Civ. Code § 1790, et seq.**

255. Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

256. Plaintiffs bring this claim on behalf of themselves and the California State Class against the Defendants.

1 257. All California State Class members who purchased Class Vehicles in California
2 are “buyers” within the meaning of Cal. Civ. Code § 1791(b).

3 258. All California State Class members who leased Class Vehicles in California are
4 “lessors” within the meaning of Cal. Civ. Code § 1791(h).

5 259. The Class Vehicles are “consumer goods” within the meaning of Cal. Civ. Code
6 § 1791(a).

7 260. Defendants are the “manufacturer[s]” of the Class Vehicles within the meaning of
8 Cal. Civ. Code § 1791(j).

9 261. Defendants impliedly warranted to Plaintiffs and the other members of the
10 California State Class that the Class Vehicles were “merchantable” within the meaning of Cal.
11 Civ. Code §§ 1791.1(a) & 1792; however, the Class Vehicles do not have the quality that a buyer
12 would reasonably expect.

13 262. The Class Vehicles would not pass without objection in the automotive trade due
14 to the SDM Calibration Defect. Because the Class Vehicles contain defective SDMs, the Class
15 Vehicles are not in merchantable condition and thus not fit for ordinary purposes.

16 263. The Class Vehicles are not adequately labeled because the labeling fails to disclose
17 the SDM Calibration Defect. The Class Vehicles do not conform to the promises and affirmations
18 made by the Defendants regarding safety.

19 264. The Defendants’ breach of the implied warranty of merchantability caused damage
20 to Plaintiff Vargas and California State Class members who purchased or leased the defective
21 Class Vehicles. The amount of damages due will be proven at trial.

22 265. Pursuant to Cal. Civ. Code §§ 1791.1(d) and 1794, Plaintiffs and California State
23 Class members seek an order enjoining Defendants’ unfair and/or deceptive acts or practices,
24 damages, punitive damages, and any other just and proper relief available under the Song-Beverly
25 Consumer Warranty Act.

26 **VIII. PRAYER FOR RELIEF**

27 Plaintiffs, on behalf of themselves and all others similarly situated, request for the Court
28 to enter judgment against the Defendants, as follows:

1 a. An order certifying the proposed Class, designating Plaintiffs as the named
 2 representatives of the Class, designating the undersigned as Class Counsel, and making such
 3 further orders for the protection of Class members as the Court deems appropriate, under Fed. R.
 4 Civ. P. 23;

5 b. An order enjoining the Defendants to desist from further deceptive
 6 distribution, sales, and lease practices with respect to the Class Vehicles and such other injunctive
 7 relief that the Court deems just and proper;

8 c. An award to Plaintiffs and Class Members of compensatory, exemplary,
 9 and punitive remedies and damages and statutory penalties, including interest, in an amount to be
 10 proven at trial;

11 d. A declaration that Defendants are financially responsible for all Class
 12 notice and the administration of Class relief;

13 e. Costs, restitution, and compensatory damages for economic loss and out-
 14 of-pocket costs, multiple damages under applicable states' laws; punitive and exemplary damages
 15 under applicable law; and disgorgement, in an amount to be determined at trial;

16 f. Any applicable statutory and civil penalties;

17 g. An award of costs and attorneys' fees, as allowed by law;

18 h. An order requiring Defendants to pay both pre- and post-judgment interest
 19 on any amounts awarded.

20 i. Leave to amend this Complaint to conform to the evidence produced at
 21 trial; and

22 j. Such other or further relief as the Court may deem appropriate, just, and
 23 equitable under the circumstances.

24 **IX. DEMAND FOR JURY TRIAL**

25 Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by jury of any
 26 and all issues in this action triable by a jury.

1 Dated: July 27, 2023

Respectfully Submitted,

2 By: /s/ David S. Stellings

3 David S. Stellings (*pro hac vice*)
4 Katherine I. McBride (*pro hac vice*)
5 Jessica A. Moldovan (*pro hac vice*)
6 **LIEFF CABRASER HEIMANN**
7 **& BERNSTEIN, LLP**
8 250 Hudson Street, 8th Floor
9 New York, NY 10013
10 Telephone: 212.355.9500
11 Facsimile: 212.355.9592
12 dstellings@lchb.com
13 kmcbride@lchb.com
14 jmoldovan@lchb.com

15 Richard Heimann (CA Bar # 063607)
16 Nimish R. Desai (CA Bar # 244953)
17 **LIEFF CABRASER HEIMANN**
18 **& BERNSTEIN, LLP**
19 275 Battery St., 29th Fl.
20 San Francisco, CA 94111-3339
21 Telephone: 415-956-1000
22 Facsimile: 415-956-1008
23 rheimann@lchb.com
24 ndesai@lchb.com

25 Roland Tellis (CA Bar #186269)
26 David Fernandes (CA Bar #280944)
27 Adam Tamburelli (CA Bar #301902)
28 **BARON & BUDD, P.C.**
15910 Ventura Boulevard, Suite 1600
Encino, California 91436
Telephone: (818) 839-2333
Facsimile: (818)-986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com
atamburelli@baronbudd.com

Christopher A. Seeger (*pro hac vice*)
Christopher L. Ayers (*pro hac vice*)
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 639-9393
cseeger@seegerweiss.com
cayers@seegerweiss.com

Shauna Itri (*pro hac vice*)
SEEGER WEISS LLP
1515 Market Street, Suite 1380
Philadelphia, PA 19102
Telephone: (215) 564-2300
Facsimile: (215) 851-8029
sitri@seegerweiss.com

W. Daniel “Dee” Miles, III (*pro hac vice*)
H. Clay Barnett, III (*pro hac vice*)
J. Mitch Williams (*pro hac vice*)
Rebecca D. Gilliland (*pro hac vice*)
Dylan T. Martin (*pro hac vice*)
**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.**
272 Commerce Street
Montgomery, AL 36104
Telephone: (334) 269-2343
Dee.Miles@beasleyallen.com
Clay.Barnett@beasleyallen.com
Mitch.Williams@beasleyallen.com
Rebecca.Gilliland@beasleyallen.com
Dylan.Martin@beasleyallen.com

David M. Birka-White (CA Bar # 85721)
BIRKA-WHITE LAW OFFICES
178 E. Prospect Avenue
Danville, CA 94526
Telephone: (925) 362-9999
dbw@birka-white.com

James E. Cecchi (*pro hac vice*)
Caroline F. Bartlett (*pro hac vice*)
**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
Facsimile: (973) 994-1744
jcecchi@carellabyrne.com
cbartlett@carellabyrne.com

Joseph H. Meltzer (*pro hac vice*)
Melissa L. Yeates (*pro hac vice*)
**KESSLER TOPAZ
MELTZER & CHECK, LLP**

280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
jmeltzer@ktmc.com
myeates@ktmc.com

Charles E. Schaffer (*pro hac vice*)
David C. Magagna Jr. (*pro hac vice*)
LEVIN, SEDRAN & BERMAN, LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
cschaffer@lfsblaw.com
dmagagna@lfsblaw.com

E. Powell Miller (*pro hac vice forthcoming*)
THE MILLER LAW FIRM, P.C.
950 West University Drive, Suite 300
Rochester, MI 48307
Telephone: (248) 841-2200
Facsimile: (248) 652-2852
epm@millerlawpc.com

Jason P. Sultzer, Esq. (*pro hac vice*)
THE SULTZER LAW GROUP P.C.
270 Madison Avenue, Suite 1800
New York, NY 10016
Tel: (845) 483-7100
Fax: (888) 749-7747
sultzerj@thesultzerlawgroup.com

EXHIBIT A

NHTSA ID No.	make	model	year	failure_date	full_text
10915473	BUICK	ENCLAVE	2014	2016-06-25	TL* THE CONTACT OWNED A 2014 BUICK ENCLAVE. WHILE DRIVING INTO AN INTERSECTION, THE DRIVER'S SIDE OF THE CONTACT'S VEHICLE WAS STRUCK BY AN ONCOMING VEHICLE. THE CONTACT'S VEHICLE SPUN OFF THE ROAD AND LANDED IN A DITCH. THE FRONT END AND DRIVER'S SIDE OF THE VEHICLE WERE SEVERELY DAMAGED. THE CONTACT WAS UNABLE TO RECALL THE DETAILS OF THE CRASH. THE AIR BAGS DID NOT DEPLOY. THE CONTACT WAS INFORMED THAT THE SEAT BELT FAILED TO LOCK AND PROPERLY RESTRAIN HIM. THE VEHICLE WAS TOWED AND TOTALED. A POLICE REPORT WAS FILED. THE CONTACT RECEIVED INJURIES TO THE RIBS, CLAVICLE, AND SHOULDER, WHICH REQUIRED MEDICAL ATTENTION. THE APPROXIMATE FAILURE MILEAGE WAS 40,000.
10995504	BUICK	ENCORE	2014	2017-06-15	I TOOK MY VEHICLE INTO THE SERRA DEALERSHIP IN WASHINGTON, MI ON 3/20/17 TO HAVE THE FRONTAL AIRBAG AND PRETENSIONER NON DEPOY SAFETY RECALL (16007) REPAIRED. ON, 6/15/17, I WAS IN A CAR ACCIDENT TRAVELING AT ROUGHLY 50 MPH AND MY AIRBAGS DID NOT DEPLOY. A FORD F-150 TURNED INTO ONCOMING TRAFFIC WITHOUT LOOKING CAUSING THE FRONT OF MY VEHICLE TO CRASH INTO THE SIDE OF HER TRUCK. THE OTHER DRIVER WAS ISSUED THE CITATION FROM THE POLICE. MY BUICK ENCORE IS MOST LIKELY TOTALED (AWAITING CONFIRMATION ON THAT).
10726387	CADILLAC	SRX	2014	2015-06-17	I WAS IN A SEVERE CRASH AND SUFFERED A SEVERE CONCUSSION. MY RIBBON FLEW OFF MY HEAD WHEN I CAME TO, I DID LOSE CONSCIOUSNESS AND WOKE UP TO ON STAR TELLING ME MY VEHICLE WAS IN A CRASH. I HAVE SEVERE PAIN IN MY NECK SHOULDER, ABRASIONS TO THE LEFT SIDE OF MY BODY AND BRUISING. THE VEHICLE IS TOTALED BUT THE AIRBAG NEVER DEPLOYED AND IT SHOULD HAVE WITHOUT A DOUBT. THERE WAS SEVERE DAMAGE TO THE ENTIRE VEHICLE.
10871604	CADILLAC	SRX	2014	2016-05-27	TL* THE CONTACT OWNS A 2014 CADILLAC SRX. WHILE DRIVING 65 MPH, THE CONTACT LOST CONTROL OF THE VEHICLE AND IT VEERED OFF THE ROAD IN BOTH DIRECTIONS AND CRASHED. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT DID NOT SUSTAIN INJURIES. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A DEALER WHERE IT WAS DIAGNOSED THAT THE REAR DRIVER SIDE CONTROL ARM NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. THE VEHICLE WAS PREVIOUSLY REPAIRED UNDER NHTSA CAMPAIGN NUMBER: 14V571000 (SUSPENSION). THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 32,000.
10615335	CHEVROLET	EQUINOX	2014	2014-05-24	TL* THE CONTACT OWNS A 2014 CHEVROLET EQUINOX. THE CONTACT STATED THAT WHILE DRIVING 16 MPH, THE CONTACT CRASHED INTO THE DRIVER'S SIDE DOOR OF ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED CHEST, RIGHT KNEE, SHOULDER AND SPINE INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS UNKNOWN.
10864509	CHEVROLET	EQUINOX	2014	2016-05-05	I BOUGHT MY 2014 CHEVY EQUINOX NEW. I WAS IN CRASH WHICH I HIT A FULL SIZE CHEVY TRUCK IN THE DRIVER DOOR AND IT TOTALED MY CAR AND NOT ONE AIR BAG CAME. I WAS CROSSING EAST AND WEST THE TRUCK WAS GOING NORTH TO SOUTH
10915132	CHEVROLET	EQUINOX	2014	2016-09-08	WAS INVOLVED IN ACCIDENT 9/8/2016. IT WAS A TOTAL LOSS. FRONT END HEAVILY DAMAGED. AIRBAGS DID NOT WORK OR THE PASSENGER SIDE SEATBELT. DRIVING STRAIGHT AT INTERSECTION AND OTHER PARTY RAN RED LIGHT STRIKING THE LEFT FRONT AND CAUSING FRAME TO CRACK.
11124021	CHEVROLET	EQUINOX	2014	2018-09-01	I HIT A DEER ON SEPT. 1, 2018 AND MY AIRBAGS DIDN'T DEPLOY.
11186171	CHEVROLET	EQUINOX	2014	2019-03-05	VEHICLE WAS IN MOTION TRAVELING STRAIGHT GOING APPROXIMATELY 50MPH WHEN IT STRUCK ANOTHER VEHICLE THAT FAILED TO YIELD THE RIGHT OF WAY. THE EQUINOX SUFFERED EXTENSIVE FRONT END DAMAGE ON THE DRIVERS SIDE BUT NO AIRBAGS DEPLOYED.
11376003	CHEVROLET	EQUINOX	2014	2020-11-16	I WAS INVOLVED IN A CAR ACCIDENT ON NOVEMBER 16, 2020 AND NEITHER OF MY AIRBAGS DEPLOYED.
10599029	CHEVROLET	SILVERADO	2014	2014-06-10	MY WIFE & SISTER WERE RUN OFF THE ROAD . THEY WENT UP A DITCH & HIT A COLVURT . THE SEATBELTS DID NOT LOCK IN PLACE & AIR BAGS DID NOT INFLATE . THIS WAS A LOANER TRUCK FROM DEALER . IT WAS A 2014 4 DOOR CHEVY SILVERADO FROM LUCAS CHEVY IN COLUMBIA TN. 38401 . I THINK THE WAS SOME SORT OF TROUBLE WITH THIS HAPPENING . PLEASE CALL FOR COMPLETE INFO ON THIS . *TR
10695408	CHEVROLET	SILVERADO	2014	2015-02-18	TL* THE CONTACT OWNED A 2014 CHEVROLET SILVERADO. WHILE DRIVING APPROXIMATELY 60 MPH, THE CONTACT REACHED OVER TO TURN THE HEAT OFF AND THE VEHICLE WENT OFF THE ROAD, DOWN A HILL, AND INTO A DITCH. THE VEHICLE CONTINUED ON UNTIL IT CRASHED INTO A CABLE THAT WAS CONNECTED TO A TELEPHONE POLE. THE TELEPHONE POLE SPLIT IN HALF. THE SEAT BELT FAILED TO RESTRAIN THE CONTACT AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED INJURIES TO HIS BACK, KNEE, AND HIP THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED AND TOWED TO A LOT. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 7,956.

10712235	CHEVROLET	SILVERADO	2014	2015-03-21	TL* THE CONTACT OWNS A 2014 CHEVROLET SILVERADO. WHILE DRIVING AT APPROXIMATELY 70 MPH, THE VEHICLE STRUCK A DEER ON THE HIGHWAY. THE FRONT AND REAR AIR BAGS FAILED TO DEPLOY. THERE WERE NO INJURIES AND A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS TAKEN TO A DEALER, BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 8,000.
11129851	CHEVROLET	TRAVERSE	2014	2018-09-15	TL* THE CONTACT OWNS A 2014 CHEVROLET TRAVERSE. WHILE DRIVING 45 MPH, THE CONTACT CRASHED INTO THE REAR PASSENGER QUARTER PANEL OF A HONDA ACCORD. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED NECK AND BACK INJURIES, WHICH DID NOT REQUIRE MEDICAL ATTENTION. THE TWO OCCUPANTS OF THE HONDA SUSTAINED UNKNOWN INJURIES, WHICH REQUIRED MEDICAL ATTENTION AT THE SCENE. A POLICE REPORT WAS FILED. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC, BUT WAS NOT DIAGNOSED OR REPAIRED. THE LOCAL DEALER AND MANUFACTURER WERE NOT CONTACTED. THE FAILURE MILEAGE WAS APPROXIMATELY 62,000. THE VIN WAS NOT AVAILABLE.
10909600	GMC	TERRAIN	2014	2016-09-18	TL* THE CONTACT OWNED A 2014 GMC TERRAIN. THE CONTACT STATED THAT WHILE DRIVING AT APPROXIMATELY 10 MPH AND MAKING A LEFT TURN, ANOTHER VEHICLE CRASHED INTO THE VEHICLE HEAD ON. THE FRONTAL AIR BAGS DID NOT DEPLOY. THE POLICE AND FIRE DEPARTMENT WERE PRESENT. NO INJURIES WERE REPORTED. THE VEHICLE WAS DESTROYED AND TOWED TO A COLLISION LOT. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 27,448.
10608599	GMC	YUKON	2014	2014-07-04	I HAD A FRONT END COLLISION AT 25 MPH WITH A PARKED CAR. MY AIRBAG(S) DID NOT DEPLOY. THE ENTIRE FRONT END OF MY CAR WAS DESTROYED. THE HOOD WAS CRUMPLED AND BOTH FRONT QUARTER PANELS DAMAGED. THE FRONT DOORS ARE NOT EASILY OPENED DUE TO THE QUARTER PANEL DAMAGE. IT IS HARD FOR ME TO UNDERSTAND HOW AN IMPACT AT THE SPEED I WAS TRAVELING AND THE LOCATION OF IMPACT DID NOT CAUSE THE AIRBAG(S) TO DEPLOY. I HAD TO BE TRANSPORTED VIA AMBULANCE FROM THE SCENE AND SUFFERED A CONCUSSION FROM MY HEAD SLAMMING DOWN ON THE STEERING WHEEL. *JS
10595132	BUICK	ENCLAVE	2013	2014-05-29	TL* THE CONTACT OWNS A 2013 BUICK ENCLAVE. THE CONTACT STATED THAT WHILE TRAVELING 5 MPH, THE VEHICLE CRASHED HEAD-ON INTO ANOTHER VEHICLE AND THE AIR BAGS DID NOT DEPLOY. THE CONTACT WAS INJURED AND REQUIRED IMMEDIATE MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE AND CURRENT MILEAGE WAS 11,500.
11352287	CADILLAC	SRX	2013	2020-08-27	HEAD ON COLLISION AT 40 MPH ON A CITY STREET. AIR BAGS DID NOT DEPLOY AND SEAT MOVED FORWARD. RESULTING IN ER VISIT AND HEAD LACERATION AND LOSS OF CONSCIOUSNESS.
10575764	CHEVROLET	EQUINOX	2013	2013-11-11	HIT A DEER WITH FRONT END OF VEHICLE CAUSING APPROXIMATELY \$6,000 IN DAMAGES. AIRBAGS DID NOT DEPLOY CAUSING CONCUSSION RECEIVED BY DRIVER. DRIVER IS STILL EXPERIENCING MEDICAL PROBLEMS DUE TO THIS ACCIDENT. *TR
10667442	CHEVROLET	EQUINOX	2013	2014-12-14	I WAS INVOLVED IN AN ACCIDENT THAT RESULTED IN DAMAGES OVER \$14,000 TO THE FRONT END OF THE VEHICLE. THE AIR BAGS DID NOT DEPLOY. I HAVE CONTACTED GM TWICE THIS WEEK AND HAVE NOT YET SPOKEN TO ANYONE IN THEIR PRODUCT ASSISTANCE DEPARTMENT. *DT
10958946	CHEVROLET	EQUINOX	2013	2016-11-23	TL* THE CONTACT OWNED A 2013 CHEVROLET EQUINOX. WHILE DRIVING APPROXIMATELY 60 MPH, THE CONTACT'S VEHICLE CRASHED INTO A SECOND VEHICLE. THE FRONT END OF THE VEHICLE SUSTAINED SIGNIFICANT DAMAGE. THE AIR BAGS DID NOT DEPLOY. THE REAR PASSENGER SEAT OCCUPANT SUSTAINED A HEAD INJURY, WHICH REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED. A POLICE REPORT WAS FILED. THE FAILURE MILEAGE WAS 50,000.
10993565	CHEVROLET	EQUINOX	2013	2017-05-09	"TAMARA RECALL" I'M WRITING REGARDING AN ACCIDENT THAT TOTALED OUT MY VEHICLE BUT NONE OF MY AIR BAGS DEPLOYED ? I HIT A DEER AT 75-80 MPH ON A HWY IT HIT MY DRIVERS SIDE HEADLIGHT AND CONTINUED UP OVER MY HOOD AND ACTUALLY DENTED PART OF MY PASSENGER SIDE FENDER I COULDN'T EVEN OPEN THE DOOR ALL THE WAY! NONE OF MY AIR BAGS WENT OFF. LUCKILY I HAD MY SEAT BELT ON WHICH SOMETHING IN THE SEAT BELT BLEW WHEN IT LOCKED ME IN PLACE DUE TO THE IMPACT OF THE DEER HITTING JUMPING OUT AT ME A WARNING POPPED UP ON MY DASH BELIEVE SAID "LOCKED" BUT ALL HAPPENED SO FAST , IT PUSHED & CRACKED JUST ABOUT EVERYTHING UNDER MY HOOD. I HAD SMOKE COMING FROM MY VEHICLE, FLUIDS ON THE GROUND NO FIRE THANKFULLY ! MY SUV WAS TOTALED AND MANY HAVE QUESTIONED ME ABOUT THE AIR BAGS. I'M NOW WONDERING THE SAME THING. WHY IN THE WORLD DID NONE OF THESE GO OFF ? IF I WOULDN'T HAVE HAD MY SEAT BELT ON WHO KNOWS WHAT WOULD HAVE HAPPENED WITH THE AIR BAGS NOT GOING OFF ! I'VE DONE RESEARCH I HAVEN'T SEEN ANY RECALLS, BUT I AM A LITTLE CONFUSED BY THIS!

10576260	CHEVROLET	SILVERADO	2013	2014-03-18	ON TUESDAY MARCH 18, 2014 I WAS DRIVING A 2013 CHEVY SILVERADO AND REAR ENDED A CHEVY TAHOE AT APPROXIMATELY 20 MPH WITHOUT HITTING MY BRAKES. CONDITIONS AT THE TIME WERE CLEAR AND DRY ALTHOUGH VERY WINDY. I WAS THE ONLY PASSENGER IN MY TRUCK. I WAS WEARING MY SEATBELT. I HIT THE STEERING WHEEL WITH MY CHEST. THE ONSTAR SYSTEM CALLED TO SAY THEY COULD SEE I WAS IN AN ACCIDENT AND HELP WAS ON THE WAY. I EXCHANGED INFO WITH THE OTHER DRIVER AND RETURNED TO MY VEHICLE. THE SEATBELT WAS IN THE EXTENDED POSITION AND WOULD NOT EXTEND FURTHER OR RETRACT. ON THE DISPLAY PANEL IT HAD AN 'AIRBAG DEPLOYED' ICON AND MESSAGE 'SERVICE AIRBAG'. MY INSURANCE COMPANY GAVE ME A AUTO REPAIR SHOP TO GO TO FOR AN ESTIMATE, HOWEVER, THE SHOP TOLD ME THEY WOULD NOT TOUCH THE VEHICLE UNTIL A GM REPRESENTATIVE INVESTIGATED THE SYSTEM FIRST AS THEY FELT THE SEATBELT SHOULD HAVE PREVENTED ME FROM HITTING THE STEERING WHEEL. I CALLED GM AND SPOKE WITH WALTER IN CUSTOMER SERVICE. HE ARRANGED TO HAVE A 'THIRD PARTY' INVESTIGATOR COME AND DO A INTERROGATION OF THE SYSTEM AND ARRANGED FOR A LOANER VEHICLE. RAYTHEON REPRESENTATIVE 'JEFF' CALLED ME SUNDAY MARCH 20 AND STATED HE WAS TO INTERROGATE THE SYSTEM AND WOULD CONTACT ME FROM THE AIRPORT WHEN HE GOT TO TOWN ON WEDNESDAY MARCH 23. ON WEDNESDAY MARCH 23 I CALLED JEFF TO SEE IF HE WAS IN TOWN AND HE STATED HE WAS AT THE AIRPORT 'LEAVING' TOWN, HE HAD DONE HIS INVESTIGATION AND DETERMINED EVERYTHING WORKED LIKE IT SHOULD. I ASKED HIM IF I WAS SUPPOSED TO HIT THE STEERING WHEEL AND HE STATED HE DID NOT AGREE OR DISAGREE. *TR
10598445	CHEVROLET	SILVERADO	2013	2014-06-08	TL* THE CONTACT OWNS A 2013 CHEVROLET SILVERADO. THE CONTACT STATED WHILE DRIVING APPROXIMATELY 35 MPH A DRUNK DRIVER CRASHED INTO THE CONTACTS VEHICLE. THE AIR BAGS DID NOT DEPLOY. THE PASSENGER SUSTAINED A BROKEN FOOT AND WAS TAKEN TO THE HOSPITAL. THE APPROXIMATE FAILURE MILEAGE WAS 22,000.
11055507	CHEVROLET	TRAVERSE	2013	2016-10-25	ON OCT 25 OF LAST YEAR WE WERE INVOLVED IN A ACCIDENT WHERE WE HIT A CAR BROADSIDED DOING ABOUT 30 MPH CAUSING CONSIDERABLE DAMAGE TO OUR CAR, BOTH MY WIFE AND MYSELF HAD TERRIBLE WHIPLASHES. AND I BELIEVE THAT SOME OF OUR PAIN COULD HAVE BEEN PREVENTED IF THE AIR BAGS WOULD HAVE DEPLOYED WHICH THEY DID NOT DO. WE WERE ON 4 LANE DIVIDED ROAD GOING THROUGH THE TOWN OF CHIEFLAND FL. WE WERE PASSING A SEMI TRUCK WHICH WAS SLOWING DOWN TO MAKE A TURN WHEN A VEHICLE CAME ACROSS THE FRONT OF THE TRUCK AND CONTINUED TO COME INTO OUR LANE WITH NO REGARDS TO STOPPING AND WE HAD NO CHOICE OR TIME TO STOP.
11093533	CHEVROLET	TRAVERSE	2013	2017-09-18	HAVE HAD MY VEHICLE IN DEALER TO FIX AIR BAG LIGHT SEVERAL TIMES AND IT IS STILL ON. MY WIFE WAS INVOLVED IN AN ACCIDENT WHERE AIRBAGS SHOULD OF DEPLOYED AND DIDN'T. LUCKILY SHE WAS NOT INJURED.
10556077	GMC	TERRAIN	2013	2013-12-13	VEHICLE WAS INVOLVED IN A SEVERE ACCIDENT WHERE THE OTHER DRIVER RAN A STOP SIGN AND HIT TERRAIN CAUSING SEVERE FRONT END AND ENGINE DAMAGE. AIR BAGS FAILED TO DEPLOY. INJURES INCLUDED WERE NECK AND BACK. DAMAGE WAS SEVERE ENOUGH TO CAUSE AIRBAGS TO DEPLOY BUT NEVER DID. HAVING AN INDEPT INSPECTION CONDUCTED AS TO WHY THEY NEVER DEPLOYED. *TR
10895896	GMC	TERRAIN	2013	2016-08-15	WAS DRIVING DOWN HIGHWAY US19 AND COLLIDED WITH ANOTHER VEHICLE AT AT LEAST 40MPH AND AIRBAGS DID NOT DEPLOY
11222110	BUICK	ENCLAVE	2012	2019-06-21	I WAS IN A COLLISION ON 6/21/2019 THAT HAD SEVERE FRONT END OBSTRUCTIONS AND WITH A STRONG TOTAL LOSS AS A RESULT. MY AIRBAGS NEVER DEPLOYED. THE VEHICLE WAS IN MOTION ON ASSEMBLY STREET, COLUMBIA SC.
10576031	CADILLAC	SRX	2012	2014-03-23	I FELL ASLEEP WHILE DRIVING, JUMPED A LEVEE, RAN THROUGH A FENCE, AND WRECKED IN A GRASSY WATERY AREA. MY ENGINE WAS SMASHED, THE MOTOR MOUNT BROKE, AND MY TIRES ARE PUSHED BACK. MY AIR BAGS DID NOT DEPLOY. MY FACE HIT THE STEERING WHEEL AND MY NOSE IS BROKEN. I WOULD LIKE TO FIND OUT IF THERE IS ANY RECALLS ON THIS CAR. *TR
10576905	CADILLAC	SRX	2012	2014-03-27	VEHICLE DRIVER AIR BAG DID NOT DEPLOY, NOR ANY OTHER AIR BAG, UPON COLLISION TO REAR OF A STOPPED PICK UP TRUCK. SPEED OF OFFENDING VEHICLE WAS APPROXIMATELY 45 MPH. DRIVER SUFFERED CHEST INJURY FROM SEAT BELT. DAMAGE ESTIMATED TO FRONT END EXCEEDS \$10,000. *TR
10682471	CADILLAC	SRX	2012	2014-12-14	MVA WITH TWO IMPACTS; FRONT DRIVER SIDE (SIGNIFICANT IMPACT) AND FRONT OF VEHICLE NO AIRBAGS DEPLOYED. *TR
10993443	CADILLAC	SRX	2012	2017-05-31	TWO CARS AHEAD OF ME WAS GOING STRAIGHT AND ALL OF A SUDDEN TURNED INTO A STRIP MALL WITHOUT INDICATOR, THE CAR IN FRONT OF ME SLAMMED ON THEIR BRAKES AND SO DID I, BUT I STILL ENDED UP REAR ENDING THE VEHICLE IN FRONT. I THINK MY SPEED WAS AROUND 30 AT THE TIME OF IMPACT. I HIT MY CHIN TO THE STEERING WHEEL. GOT MULTIPLE CUTS INSIDE OF MY MOUTH. AND COUPLE OF THEM ON MY FACE WHICH REQUIRED STITCHES. MY AIR BAG DID NOT DEPLOY AND NEITHER THE SEATBELT PREVENTED IT, WHICH I THOUGHT WAS ODD. CHECKED WITH CADILLAC IF HEY WERE AWARE OF ANY PROBLEM WITH THE CAR. THEY DENIED THE EXISTENCE OF SUCH AN ISSUE. SO I WANT TO GET THE VEHICLE INVESTIGATED, SO THAT NOBODY ELSE SHOULD GET HURT THE WAY I DID; ALSO I HAVE ANOTHER CADILLAC AND NEED TO KNOW. WILL REALLY APPRECIATE IT. THANKS

11138938	CADILLAC	SRX	2012	2018-06-25	ON 6/25/18, MY WIFE WAS TRAVELING 45 MPH., IN OUR 2012 CADILLAC SRX. THE VEHICLE IN FRONT OF HER WENT TO MAKE A LEFT TURN INTO A SUBDIVISION. BUT, THEN DECIDED NOT TO DO THAT AND PULLED BACK INTO THE LANE OF MY WIFE. SHE SLAMMED ON HER BRAKES, TO AVOID HITTING THE VEHICLE. HOWEVER, SHE COULDN'T ANTICIPATE THEIR MOVE. SHE HIT THEM FROM BEHIND, GOING 45MPH. SHE HIT HER FOREHEAD ON THE VISOR BAR TWICE, CAUSING A SKULL FRACTURE, BRAIN BLEED, SEVER CONCUSSION, DEEP LACERATIONS, A BURST ARTERY IN HER FOREHEAD TO WHERE SHE WAS BLEEDING HEAVILY AND UNCONSCIOUS. HER CHEST HIT THE STEERING WHEEL, WHICH BADLY BRUISED HER RIBS, CAUSING A HIATAL HERNIA, DUE TO THE IMPACT. SHE SUFFERED LACERATIONS TO HER LEFT ARM, KNEE AND HAS RUPTURED DISCS IN HER CERVICAL SPINE. SHE WAS ICU FOR SEVERAL DAYS DUE TO THE BRAIN BLEED AND HEAD INJURIES SHE SUSTAINED. OUR AIR BAG NEVER DEPLOYED AND THE DRIVER SEAT BELT DIDN'T LOCK ON IMPACT, ALLOWING HER TO BOUNCE UPWARD TWICE AND SUSTAINED THE HEAD INJURIES. THE CADILLAC AIR BAGS AND SEAT LOCKING MECHANISMS FAILED TO PROTECT HER FROM INJURIES SHE SHOULD HAVE NEVER HAD. SOMEONE NEEDS TO RESEARCH FURTHER THESE ISSUES FOR THE 2012 SRX SO OTHER CONSUMERS DON'T FEEL SAFE IN A VEHICLE, WHERE THE SAFETY MECHANISMS FAIL. CADILLAC SHOULD NOT BE ABLE TO GET AWAY WITH THIS. SHOULD THE 2012 SRX HAVE A RECALL ON AIR BAGS AND SEAT BELT LOCKING MECHANISMS FAILING? MORE THAN ONE COMPLAINT HAS BEEN POSTED, SO I HOPE THE NHTSA INVESTIGATES THIS FOR US ALL. PLEASE CONSIDER THIS A FORMAL COMPLAINT! THANK YOU, AND PLEASE FOLLOW UP! *TR
10546238	CHEVROLET	EQUINOX	2012	2013-09-20	I WAS TRAVELING SOUTH AS ANOTHER CAR WAS TRAVELING NORTH. THE CAR TRAVELING NORTH MADE A RAPID LEFT TURN DIRECTLY IN MY TRAVELING PATH. WE COLLIDED AND MY CAR WAS TOTALED. I HIT THE STEERING WHEEL PRETTY HARD BECAUSE THE AIRBAG DID NOT DEPLOY. HOW SHOULD I PROCEED? *TR
10979985	CHEVROLET	EQUINOX	2012	2017-03-31	I WAS INVOLVED IN AN ACCIDENT WHERE I REAR ENDED A STOPPED VEHICLE. MY CRUISE WAS SET AT 57 MPH AND I DID NOT APPLY BRAKES. BECAUSE CRUISE WAS SET, I HIT ONCE, BOUNCED BACK AND HIT AGAIN. MY AIRBAGS DID NOT DEPLOY AT ALL. THE VEHICLE HAS EXTENSIVE DAMAGE TO THE FRAME BUT NO AIRBAG DEPLOYMENT.
11329614	CHEVROLET	EQUINOX	2012	2020-05-31	TL* THE CONTACT OWNED A 2012 CHEVROLET EQUINOX. THE CONTACT STATED THAT WHILE HER HUSBAND WAS DRIVING ABOUT 25 MPH, HE SUFFERED A MEDICAL CONDITION AND LOST CONTROL OF THE VEHICLE, CRASHING INTO A THREE FEET HIGH CEMENT BOULDER. THE AIR BAGS DID NOT DEPLOY. BOTH THE DRIVER AND THE FRONT PASSENGER SUSTAINED INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE DRIVER AND THE PASSENGER HAD THEIR SEAT BELTS LATCHED AT THE TIME OF THE CRASH. THE VEHICLE WAS TOTALED AND WAS TOWED TO A TOW YARD. THE DEALER AND THE MANUFACTURER WERE NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 133,000.
10790202	CHEVROLET	SILVERADO	2012	2015-09-30	RECENTLY I WAS INVOLVED IN AN ACCIDENT THAT WAS A DIRECT IMPACT. AT THE TIME OF THIS ACCIDENT THE SEAT BELT DID NOT LOCK NOR DID THE AIR BAGS DEPLOY. THE SPEED FROM THIS ACCIDENT WAS BETWEEN 50-55 MPH ON THE HIGHWAY. AT THE RATE OF SPEED I WAS GOING BEFORE THE ACCIDENT AND THE FACT THAT I HAD TO SLAM ON THE BREAKS TO BEGIN SLOWING DOWN ONE WOULD HAVE THOUGHT THE SEAT BELT WOULD HAVE LOCKED BUT IT DID NOT AND AT THE POINT OF IMPACT I WAS VERY SURPRISED THAT THE AIRBAGS DID NOT DEPLOY BUT YET THE SYSTEM INDICATED THAT IT DID AND NEEDED TO BE RESET. HOWEVER NOW THAT THE VEHICLE IS IN PROCESS OF BEING REPAIRED I AM BEING TOLD THAT THE ENTIRE AIRBAG SYSTEM HAS TO BE REPLACED ALONG WITH THE DRIVER SEAT BELT.
10622016	CHEVROLET	TAHOE	2012	2014-08-09	WHILE TURNING LEFT (TAHOE) WITH A PROTECTED GREEN ARROW AT AN X-SHAPED INTERSECTION, VEHICLE (KIA SEDAN) AT FAULT FAILED TO YIELD AND ENTERED THE INTERSECTION AT SPEEDS UPWARDS OF 40 MPH FROM THE LEFT OF THE TAHOE. FRONT-IMPACT COLLISION OCCURRED; DUE TO THE SHAPE OF THE INTERSECTION AND THE VELOCITY OF THE IMPACT, TAHOE STRUCK PASSENGER SIDE OF KIA SEDAN. TRAJECTORY OF IMPACT CAUSED DIRECTIONAL CHANGES IN UPWARDS OF 90° FOR BOTH VEHICLES; THE FORCE OF THE PRIMARY ACCIDENT DESCRIBED ABOVE ALSO CAUSED MENTIONED VEHICLES TO COLLIDE WITH LEFT REAR OF ANOTHER VEHICLE (HONDA SEDAN), CAUSING NEAR 360° ROTATION OF THE HONDA SEDAN. DUE TO THE FORCE OF IMPACT, FRONT & SIDE AIRBAGS DEPLOYED ON BOTH THE KIA SEDAN AND THE HONDA SEDAN, BUT FAILED TO DEPLOY ON THE TAHOE. SCENE INDICATED THAT THE KIA SEDAN MADE NO ATTEMPT TO BRAKE OR DECREASE SPEED PRIOR TO COLLISION; POSTED SPEED LIMIT AT INTERSECTION IS 40 MPH. FORCE WAS SUCH THAT AFTER THE COLLISION, TAHOE TRANSMISSION WAS IN DRIVE, BUT REMAINED AT A COMPLETE STOP. DAMAGE SUSTAINED ON THE TAHOE INCLUDE FRONT-END BODY DAMAGE, ENGINE DAMAGE (VEHICLE REQUIRED TOWING AND WAS INOPERABLE), AND FRAME DAMAGE, AT A MINIMUM. IN ADDITION, ENGINE SERVICE LIGHTS AS WELL AS ONSTAR VEHICLE DIAGNOSTIC REPORTS INDICATE THAT THE AIRBAG SYSTEM, ANTILOCK BRAKING SYSTEM, AND THE STABILITRAX STABILITY CONTROL SYSTEM ALSO SUSTAINED DAMAGE AND REQUIRE ATTENTION. MULTIPLE FIRST-RESPONDERS COMMENTED ON THE ODDITY THAT, GIVEN THE DAMAGE SUSTAINED BY THE TAHOE AND THE VELOCITY AT IMPACT, THE AIRBAGS DEPLOYED ON ALL VEHICLES BUT THE TAHOE. *TR

11194940	CHEVROLET	TAHOE	2012	2018-03-19	I WAS DRIVING WEST BOUND ON 176TH ST AND AS I APPROACHED THE LIGHT I COULD NOT BRAKE OR TURN MY CAR TO THE RIGHT IN WHICH I HAD A HEAD ON COLLISION WITH ANOTHER VEHICLE. ON IN PACKED MY AIRBAGS DID NOT DEPLOY! THE DRIVER OF THE OTHER VEHICLE EVEN TOLD THE OFFICER HE WAS TRYING TO TURN , HIS EYES WERE AS BIG AS A COWS CLEARLY HE WAS IN DISTRESS. LUCKILY NEITHER OF US WERE INJURED.
11278797	CHEVROLET	TAHOE	2012	2018-08-24	AS I WAS DRIVING ON 176TH GETTING READY TO TURN ON SPANAWAY LOOP MY WOULDN'T COMPLETE THE RIGHT TURN OR STOP SO I HAD A HEAD ON COLLISION WITH ANOTHER TRUCK AND MY AIR BAGS DIDN'T DEPLOY.
10885565	CHEVROLET	TRAVERSE	2012	2016-06-30	THE DRIVER STEERING WHEEL FRONT AIRBAG DID NOT DEPLOY WHEN I HIT ANOTHER VEHICLE FROM BEHIND. WHEN WE RECEIVED THE LETTER ABOUT RECALL WE BROUGHT THE VEHICLE INTO SERVICE CHEVROLET IN LAFAYETTE, LA.
10882239	GMC	ACADIA	2012	2016-06-14	MY WIFE AND THREE DAUGHTERS, AGES 11, 9, AND 6, WERE INVOLVED IN A MAJOR CRASH. AN ELDERLY MALE TRAVELED THRU A STEADY RED TRAFFIC SIGNAL AND STRUCK THE PASSENGER SIDE OF MY WIFE'S VEHICLE AS SHE WAS CROSSING THE INTERSECTION WITH A GREEN TRAFFIC SIGNAL. AFTER IMPACT, THEY WERE PUSHED HEAD ON INTO A TRAFFIC STANDARD (WHICH WAS TAKEN OUT COMPLETELY) AND THEN INTO A TELEPHONE POLE, ALSO HEAD ON. NOT ONE AIRBAG DEPLOYED. THE VEHICLE IS SUPPOSEDLY EQUIPPED WITH FRONT AND SIDE AIRBAGS. IN MARCH OF 2014 THERE WAS A RECALL CONCERNING THE AIRBAGS NOT DEPLOYING IN THESE VEHICLES (# 14V118000). I HAVE OWNED THIS VEHICLE SINCE NEW AND DID RETURN IT TO THE DEALERSHIP IN MAY OF 2014 FOR THE RECALL SHORTLY AFTER RECEIVING NOTIFICATION. I WAS ADVISED THAT IT WAS TAKEN CARE OF.
10925628	GMC	ACADIA	2012	2016-09-27	THE VEHICLE WAS IN MOTION NEAR AN INTERSECTION AND APPROACHING THE LIGHT TO TURN. (NEAR AIRPORT IN RALEIGH NC) THE FRONT AND SIDE AIRBAGS FAILED TO DEPLOY DURING THE CRASH. THE OTHER VEHICLE HAS BEEN DECLARED TOTAL LOSS AND MINE HAS SIGNIFICANT DAMAGE AND COULD BE CLASSIFIED AS TOTAL LOSS. THERE ARE PERSONAL INJURIES. I AM ATTACHING PICTURES OF THE VEHICLE AND ACCIDENT REPORT.
10466384	GMC	TERRAIN	2012	2012-04-16	?ON APRIL 16TH OUR SON WAS DRIVING ON FAIRVIEW RD. AND TRAVELING THROUGH A GREEN LIGHT WHEN A CAR THAT RAN A RED LIGHT HIT HIM. ?THIS CAR ? A GMC 2012 TERRAIN WAS HIT MULTIPLE TIMES ? DRIVER'S FRONT END, FRONT END AND SPUN AROUND FROM THE FORCE AND HIT ON THE PASSENGER SIDE. NO AIRBAGS DEPLOYED ?[XXX] WAS IMMEDIATELY CONTACTED BY ON STAR, THEY CALLED POLICE, HIS CAR WAS TOTALED ?ON 4/21 I EMAILED GMC AND ASKED WHAT DEPARTMENT I WOULD CONTACT TO FILE A COMPLAINT ABOUT THE FRONT AND SIDE AIRBAGS NOT DEPLOYING CALL FROM GMC 866-790-5700 EXT. 22745 SAID ON VOICE MAIL ? THE AIRBAG DID NOT DEPLOY AS IT SHOULD HAVE? HE MADE A CASE NUMBER [XXX] GMC HAS SINCE DECLARED THIS WAS A LOW THRESHOLD EVENT - NO NEED FOR AIRBAG DEPLOYMENT - YET THE CAR WAS TOTALED AND OUR SON HAS WHIPLASH AND CONTUSIONS INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR
10477166	GMC	TERRAIN	2012	2012-09-04	TL* THE CONTACT OWNS A 2012 GMC TERRAIN. THE CONTACT STATED THAT HE FELL ASLEEP WHILE DRIVING AN UNKNOWN SPEED. THE VEHICLE TRAVELED TO THE RIGHT SIDE OF THE ROAD AND WENT AIRBORNE APPROXIMATELY 20 FEET, LANDING ON ALL FOUR TIRES. THE VEHICLE THEN TRAVELED APPROXIMATELY 200 FEET AND CRASHED INTO AN EMBANKMENT. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED A FRACTURED BACK AS A RESULT. A POLICE OFFICER WITNESSED THE INCIDENT AND FILED A REPORT. THE VEHICLE WAS DESTROYED AND TOWED TO A COLLISION CENTER. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAULTY AIR BAGS. THE APPROXIMATE FAILURE MILEAGE WAS 7,000. UPDATED 10/16/12*LJ
10516265	GMC	TERRAIN	2012	2013-06-08	VEHICLE WAS INVOLVED IN A CAR ACCIDENT AND CRASHED INTO A BRIDGE IRON BEAM HEAD-ON. VEHICLE'S AIR BAGS FAILED TO DEPLOY. HOOD AND FRONT OF CAR SMASHED AS VEHICLE WAS WRAPPED AROUND BEAM. ONLY MINOR INJURIES TO DRIVER, AS DRIVER WAS WEARING A SEATBELT. *TR
10583703	GMC	TERRAIN	2012	2014-03-13	I INADVERTENTLY VEERED OFF SIDE ROADWAY, (VA HIGHWAY 220) COLLIDING WITH A TREE/ROADSIDE SHRUBS, ETC (WAS KNOCKED UNCONSCIOUS AS FOREHEAD HIT STEERING WHEEL ON INITIAL IMPACT). AIRBAGS DID NOT DEPLOY ALLOWING ME TO SUSTAIN A HEAD INJURY THAT KNOCKED ME UNCONSCIOUS... FOREHEAD WAS GASHED WITH SIGNIFICANT BLEEDING. I WAS TRANSPORTED BY AMBULANCE IN UNCONSCIOUS STATE. DAMAGE TO VEHICLE IS IN EXCESS OF \$8,000 SO FAR AS VEHICLE STILL IN REPAIR SHOP WITH MASSIVE FRONT END DAMAGE THAT AFFECTS STEERING LINKAGE, ETC. THE IMPACT OF VEHICLE AGAINST FOLIAGE, TREES SHRUBS, SHOULD HAVE FORCED AIR BAGS TO DEPLOY AND I BELIEVE THAT I WOULD NOT HAVE SUSTAINED A HEAD INJURY THAT RENDERED ME UNCONSCIOUS WITH MILD CONCUSSION AND COULD NOT CONTROL VEHICLE LEAVING ROADWAY. *TR

10588334	GMC	TERRAIN	2012	2014-03-13	VEERED OFF SIDE OF HIGHWAY, STRUCK SOMETHING HEAD-ON AND WAS RENDERED UNCONSCIOUS AS HEAD HIT STEERING WHEEL. I WAS TRANSPORTED UNCONSCIOUS IN AMBULANCE FROM CRASH SCENE TO LOCAL HOSPITAL, WHERE I WAS AN INPATIENT FOR TWO DAYS. EXTENSIVE DAMAGE TO FRONT OF VEHICLE INDICATED THE SEVERITY OF IMPACT... YET AIR BAGS DID NOT DEPLOY. I BELIEVE AIR BAGS SHOULD HAVE DEPLOYED ON IMPACT AND I WOULD NOT HAVE BEEN RENDERED UNCONSCIOUS, AND COULD HAVE CONTROLLED VEHICLE TO AVOID STRIKING TREE, BRUSH, ETC. I CONTACTED GMC CORPORATE.. TO ADVISE MY CONCERNS FOR SAFETY... RECEIVED A FOLLOW UP TELEPHONE CALL FROM GMC REPRESENTATIVE... (HE) EXPRESSED NO INTEREST IN MY COMPLAINT... REFUSED TO COMMENT ON MY STATEMENT THAT AIR BAG FAILED TO DEPLOY RESULTING IN EXTENSIVE DAMAGE TO FRONT OF VEHICLE AND SUSTAINING A HEAD INJURY AS NO BAG DEPLOYED. NO MATTER THAT I AM LEASING THE VEHICLE AND FEAR FOR MY SAFETY... I WAS ADVISED THAT GMC HAD NO FURTHER INTEREST IN THIS MATTER AND WOULD NOT EVALUATE MY SAFETY CONCERNS. *TR
10722057	GMC	TERRAIN	2012	2015-05-19	CAR CRASH AT 45 MPH. FRONT IN DAMAGE AND AIR BAG DID NOT DEPLOY. SEATBELTS DID NOT LOCK UP.
10924918	GMC	TERRAIN	2012	2016-11-06	I WAS TRAVELING ABOUT 75MPH WHEN A DEER RAN INFRONT OF ME, I WASN'T ABLE TO STOP COMPLETELY AND HIT THE DEER ON MY RIGHT FRONT SIDE OF MY VEHICLE.. THE SMELL OF SMOKE CAME FROM MY VEHICLE AND MY "SERVICE AIRBAGS" INDICATOR CAME ON.. NO AIRBAGS DEPLOYED.. I HAD MY 6 YEAR OLD SON IN THE CAR WITH ME!! MY CAR ISN'T DRIVABLE DUE TO THE SIGNAL BEING ON EVEN THOUGH THE AIRBAGS DIDN'T DEPLOY.
11088412	GMC	TERRAIN	2012	2016-04-21	TL* THE CONTACT OWNED A 2012 GMC TERRAIN. WHILE DRIVING AT AN UNKNOWN SPEED, THE DRIVER CRASHED INTO A LANDSCAPING TRUCK. THE AIR BAGS FAILED TO DEPLOY. THERE WERE NO INJURIES. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A TOW LOT AND DEEMED DESTROYED. THE DEALER WAS NOT CONTACTED TO DETERMINE THE CAUSE OF THE AIR BAG FAILURE. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS UNKNOWN.
11219747	GMC	TERRAIN	2012	2019-06-12	TL* THE CONTACT OWNS A 2012 GMC TERRAIN. THE CONTACT STATED THAT WHILE HER GRANDSON WAS DRIVING APPROXIMATELY 40-45 MPH, A DEER JUMPED INTO THE FRONT OF THE VEHICLE CAUSING SEVERE DAMAGE TO THE FRONT END OF THE VEHICLE BUT THE AIR BAGS DID NOT DEPLOY. THE CONTACT MENTIONED THAT THE RADIATOR WAS PUSHED INTO THE ENGINE. THE CONTACT SUSTAINED WHIPLASH INJURIES THAT DID NOT REQUIRE MEDICAL ATTENTION. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS TOWED. THE CAUSE OF THE FAILURE WAS NOT DETERMINED BY THE INDEPENDENT MECHANIC. THE LOCAL DEALER WAS NOT NOTIFIED OF THE FAILURE. THE MANUFACTURER WAS CONTACTED AND A CASE WAS OPENED BUT NO ASSISTANCE WAS OFFERED. THE FAILURE MILEAGE WAS 103,000. *AS *AS
10573780	BUICK	ENCLAVE	2011	2012-10-10	TURNED CORNER ON IRONWOOD46615 AND REAR ENDED CAR THAT STOPPED SUDDENLY. CRUSHED MY FRONT END BACK TO PUNCTURING THE RADIATOR. NO AIR BAG DEPLOYED AND NO SEAT BELT ON IMPACT. MY KNEES HIT THE DASH UNDER THE STEERING WHEEL. NO ONSTAR AS NO AIRBAG DEPLOYED. HOLDING STEERING WHEEL WAS MY ONLY DETERRENT TO HITTING FORWARD. REPAIRS COST \$5000.+ AND GM DEALER INSISTED AIRBAG AND SEAT BELT WERE FUNCTIONING. KNEES STILL HURT. AND SEEN DOCTOR ABOUT KNEES AND GOING AGAIN SOON. I AM REPORTING THIS AFTER HEARING THAT THERE ARE RECALLED ON SEAT BELTS AND AIRBAGS ON DRIVER SIDE. *TR
10608978	BUICK	ENCLAVE	2011	2014-06-30	TL - THE CONTACT OWNS A 2011 BUICK ENCLAVE. THE CONTACT STATED WHILE DRIVING AT UNKNOWN SPEED, THE VEHICLE CRASHED INTO A DEER CAUSING THE VEHICLE TO CATCH ON FIRE AND THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE AND CURRENT MILEAGE WAS 56,000. PAM UPDATED 11/24/14*UJ UPDATED 8/17/2015*JS
10732977	BUICK	ENCLAVE	2011	2015-07-04	DRIVING DOWN THE ROAD ON A 50MPH ZONE AND A VEHICLE PULLED OUT IN FRONT OF US. OUR CAR T-BONED THE CAR THAT PULLED IN FRONT OF US. EVERYONE HAD THERE SEATBELTS ON BUT THE FRONT AIRBAGS NEVER DEPLOYED. I DONT UNDERSTAND WHY THEY WOULDNT HAVE DEPLOYED WHEN WE HIT THE OTHER CAR AT AT LEAST 40MPH AFTER SLAMMING ON THE BREAKS.
10654934	CADILLAC	SRX	2011	2014-10-23	I WAS TURNING SOUTH WITH A GREEN ARROW WHEN THE SECOND DRIVER RAN A RED LIGHT TRAVELING EAST AND WE COLLIDED. HE WAS TRAVELING AT APPROXIMATELY 40-45 MILES PER HOUR AND I WAS TRAVELING AT APPROXIMATELY 30 MILES AN HOUR. OUR IMPACT WAS SOMEWHAT OF A T-INCIDENT WITH THE FRONT END OF MY CAR DAMAGED AND HIS CAR ON THE DRIVER'S SIDE DAMAGED. MY AIR BAGS DID NOT INFLATE, EVEN THOUGH WE BELIEVE THE IMPACT WAS AT THE ANGLE AND THE REQUIRED SPEED OF VEHICLES TO INFLATE THEM. THE AIR BAGS IN THE SECOND DRIVER'S CAR (FORD FOCUS) DID INFLATE. *TR
10679589	CADILLAC	SRX	2011	2015-01-08	TL* THE CONTACT OWNED A 2011 CADILLAC SRX. WHILE DRIVING 35 MPH, THE CONTACT CRASHED INTO ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY AND THE FRONT PASSENGERS SIDE SEAT BELT WAS LOOSE. A POLICE REPORT WAS FILED AND THREE UNKNOWN INJURIES WERE REPORTED. THE CONTACT DID NOT DISCLOSE IF MEDICAL ATTENTION WAS REQUIRED OR NOT. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 60,000.

11192908	CADILLAC	SRX	2011	2018-12-19	I WAS INVOLVED IN AN ACCIDENT, I RAN INTO A VEHICLE THE DAMAGE WAS TO THE FRONT OF THE CAR . THE AIRBAGS DIDNT DEPLOY OR THE SENSORS OF THE FRONT OF MY CAR DID NOT GO OFF EITHER.
10391449	CHEVROLET	EQUINOX	2011	2011-03-10	I WAS RECENTLY IN A PRETTY BAD FRONT END VEHICLE ACCIDENT GOING ABOUT 45 MPH WHEN I REAR ENDED SOMEONE. MY CAR HAS BEEN TOTALED DO TO THE DAMAGE TO THE FRONT END OF THE VEHICLE. MY AIR BAGS DID NOT DEPLOY IN THIS ACCIDENT, EVERYONE ONE I HAVE TALKED TO FROM THE TOWING COMPANY TO THE PARAMEDIC ON SEEN SAID THAT IT SHOULD HAVE DEPLOYED.
10449809	CHEVROLET	EQUINOX	2011	2012-01-23	2011 CHEVROLET EQUINOX. CONSUMER STATES AIRBAGS DID NOT DEPLOY DURING CRASH *TGW THE CONSUMER STATED ANOTHER VEHICLE PULLED OUT IN FRONT OF HIM FROM A SIDE STREET, ON HIS RIGHT SIDE, WHICH RESULTED IN THE CONSUMER HITTING THE OTHER VEHICLE, WHEN THAT VEHICLE FAILED TO STOP AT A STOP SIGN. THE CONSUMER STATED THE ENTIRE FRONT END OF THE VEHICLE WAS DESTROYED. *JB
10552442	CHEVROLET	EQUINOX	2011	2013-07-31	AIR BAGS DID NOT DEPLOY AT OR ABOVE THE MFG. THRESHOLDS.WHICH CAUSED FOR NO AIR BAG DEPLOYMENT AND SIGNIFICANT FACIAL TRAUMA ON THE STEERING WHEEL. SEAT BELT PRETENSIONERS ALSO DID PRETENSION CAUSING THE UPPER TORSO TO GO FORWARD AND CAUSE THE FACIAL TRAUMA ON THE STEERING WHEEL. *TR
10682338	CHEVROLET	EQUINOX	2011	2015-01-29	WHILE CHANGING LANES DURING AN ICE STORM, THE VEHICLE'S BACK END LET LOSE AND THE DRIVER LOST CONTROL AND SLIDE INTO THE MEDIA AT WHICH TIME THE VEHICLE WAS PROJECTED INTO THE GUARDRAIL HEAD ON. NEITHER FRONT AIRBAGS DEPLOYED NOR DID ANY OF THE AIRBAGS DEPLOY. *TR
10721958	CHEVROLET	EQUINOX	2011	2015-05-09	TL* THE CONTACT OWNS A 2011 CHEVROLET EQUINOX. THE CONTACT WAS INVOLVED IN A FRONTAL CRASH. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS NOT FILED AND NO INJURIES WERE SUSTAINED. THE VEHICLE WAS DECLARED DESTROYED BY THE INSURANCE COMPANY. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 58,000.
10949808	CHEVROLET	EQUINOX	2011	2017-01-31	INVOLVED IN AN ACCIDENT WHERE I COLLIDED WITH ANOTHER CAR. THE FRONT END OF MY CAR WAS COMPLETED DAMAGED TO THE POINT WHERE THE CAR WAS TOTALED. THE PROBLEM WITH THIS ACCIDENT WAS THE AIR BAGS DID NOT GO OFF CAUSING INJURY TO MYSELF AND MY WIFE. I ESTIMATE THE SPEED AT COLLISION TO BE AROUND 30MPH. I WAS TRAVELING WEST BOUND AT ABOUT 630PM IN THE EVENING, ON A FOUR LANE CITY ROAD WITH A CENTER TURN LANE. I WAS IN MY LANE AND FAILED TO STOP BEFORE HITTING THE CAR IN FRONT OF ME. MY WIFE SPOKE WITH THE REPAIR SHOP CLERK WHO INFORMED THAT THIS WAS A COMMON ISSUE WITH MANY EQUINOX'S UNDER THE SAME CONDITIONS. I BELIEVE THE AIR BAGS SHOULD HAVE GONE OFF AND THEREFORE I
11010876	CHEVROLET	EQUINOX	2011	2017-06-09	JUNE 9, 2017 AT 10:00 PM I HIT A DEER ON SOUTH DAKOTA HWY 11 IN LINCOLN COUNTY. THE SPEED LIMIT WAS 65 MPH AND I WAS GOING 68 MPH WHEN I HIT THE DEER HEAD ON. I DROVE OVER TO THE SIDE OF THE ROAD AND THE VEHICLE STOPPED. AFTER A FEW MINUTES MY WIFE AND I SMELLED BURNING ELECTRICAL WIRE. WE GOT OUT OF THE CAR AND STARTED TO WALK AWAY AND WITHIN 10 MINUTES THE WHOLE THING WENT UP IN FLAMES. THE CAR WAS TOTALED AND THE AIRBAGS DID NOT GO OFF. IF WE WOULD HAVE WENT IN THE DITCH AND BEEN UNCONSCIOUS WE WOULD HAVE BURNT UP WITH THE VEHICLE. THERE IS NO REASON THAT VEHICLE SHOULD HAVE STARTED ON FIRE. GMC WILL NOT ACKNOWLEDGE THAT THERE WAS ANYTHING WRONG WITH THE VEHICLE.
11189908	CHEVROLET	EQUINOX	2011	2019-03-08	VECHICAL WAS INVOLVED IN A CRASH, REAR ENDED ANOTHER VEHICLE, VECHICAL WAS TOTALED. AIRBAGS NEVER WENT OFF. ON A HIGHWAY ABOUT 50-60 MPH.
10607261	CHEVROLET	SILVERADO	2011	2014-02-14	MY VEHICLE WAS FORCED OFF THE ROAD BY ANOTHER VEHICLE CAUSING MY VEHICLE TO HIT A LIGHT POLE HEAD ON. NO AIR BAGS DEPLOYED. DRIVER AND PASSENGER SUFFERED INJURY. *TR

10487443	CHEVROLET	TAHOE	2011	2012-12-02	I WAS DRIVING WEST ON RIO RD. IN CHARLOTTESVILLE, VA, AT ROUGHLY 35 MPH. AT APPROXIMATELY 6:00 PM, A DEER EMERGED FROM THE PASSENGER SIDE OF THE VEHICLE. IT HAPPENED INSTANTANEOUSLY AND AVOIDING THE DEER WAS NOT AN OPTION. IMMEDIATELY AFTER STRIKING THE DEER AT THE FRONT RIGHT BUMPER (UNDERNEATH HEADLIGHT), THE SIDE AIRBAGS DEPLOYED IN MY 2011 CHEVY TAHOE. HOWEVER, THE AIRBAG THAT WAS SUPPOSE TO DEPLOY FROM THE DRIVERS SEAT (ON THE SIDE NEAR SEATBELT) DID NOT DEPLOY. ADDITIONALLY, THE FRONT TWO AIRBAGS (FROM STEERING WHEEL AND DASHBOARD) DID NOT DEPLOY AS WELL. MOREOVER, APPROXIMATELY THREE MONTHS BACK, ANOTHER FAMILY MEMBER ALSO HIT A DEER WITH THE SAME VEHICLE (2011 CHEVY TAHOE) AND AT THAT TIME NO AIRBAGS DEPLOYED. IN THIS INCIDENT THE VEHICLE WAS TRAVELING 70 MPH AND THE DEER STRUCK THE LEFT SIDE OF THE FRONT BUMPER AND NO AIRBAGS DEPLOYED. AT THE TIME, WE DIDN'T EVEN THINK ABOUT DEFECTIVE AIRBAGS, BUT NOW, WE ARE VERY, VERY CONCERNED THAT THERE'S A DEFECT. WE SIMPLY DO NOT KNOW WHAT TO DO. I HAVE CONTACTED CHEVROLET DIRECTLY AND THEY ASSURE ME SOMEONE WILL COME OUT AND LOOK AT THE VEHICLE THIS WEEK SOMETIME. I WOULD BE RELIEVED IF SOMEONE FROM THE NHTSA ALSO INVESTIGATES THESE TWO SCENARIOS. WHAT IS CHEVROLET'S RESPONSIBILITY TO ME AND MY FAMILY IN THESE TWO CASES? AND WHAT IS THE BEST COURSE OF ACTION? FURTHERMORE, I CAN ARRANGE FOR MY INSURANCE ADJUSTOR TO GATHER ANY DOCUMENTATION FROM THE FIRST INCIDENT (WHERE AIRBAGS DID NOT DEPLOY) SUCH AS PHOTOS, REPORTS AND PROVIDE THEM TO YOU. THE VEHICLE IS SITTING IN MY DRIVEWAY BECAUSE I AM WAITING FOR A CHEVROLET REPRESENTATIVE TO COME AND INSPECT IT. I WOULD APPRECIATE YOUR PROMPT ACTION IN THIS MATTER. THANK YOU! *TR
10586298	CHEVROLET	TRAVERSE	2011	2011-05-31	I WAS GOING STRAIGHT AT 40 MPH (CONFIRMED BY GM ENGINEER). ANOTHER VEHICLE TURNED IN FRONT OF ME AND THERE WAS A T-BONE STYLE OF ACCIDENT. THE OTHER CAR WAS TOTALED AND MINE TOOK ABOUT \$18000 OF DAMAGE. NONE OF MY AIRBAGS DEPLOYED. I COMPLAINED TO GM, THEY SENT AN ENGINEER OUT TO LOOK AT THE VEHICLE BEFORE IT WAS REPAIRED TO ASSESS AND THEY SAID THAT THE AIRBAGS NOT DEPLOYING MEANT THAT THEY FUNCTIONED CORRECTLY. THE ENGINEERS REPORT SAID AT THE MOMENT OF IMPACT, MY CAR WAS TRAVELING 40MPH, AND I HAVE A HARD TIME BELIEVING THAT THE AIRBAGS WOULDN'T DEPLOY UNDER ANY CIRCUMSTANCES WHILE THE VEHICLE IS TRAVELING 40MPH. *TR
11113909	CHEVROLET	TRAVERSE	2011	2018-07-16	AIR BAGS DO NOT COME OUT IN HIGHWAY IMPACT OF 70 MILES PER HOUR.
10794590	GMC	TERRAIN	2011	2015-11-12	TL* THE CONTACT OWNS A 2011 GMC TERRAIN. WHILE DRIVING APPROXIMATELY 55 MPH, THE CONTACT CRASHED INTO THE SIDE OF ANOTHER VEHICLE THAT VEERED INTO THE CONTACT'S LANE. THE AIR BAGS FAILED TO DEPLOY. THERE WERE MINOR INJURIES THAT DID NOT REQUIRE MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A TOW YARD. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 70,000. UPDATED 04/01/16 *BF *CN
10851422	GMC	TERRAIN	2011	2016-01-15	TL* THE CONTACT OWNS A 2011 GMC TERRAIN. WHILE DRIVING 55 MPH, THE CONTACT FELL ASLEEP CRASHED INTO THE REAR OF ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED INJURIES TO THE SPINE, WHICH REQUIRED MEDICAL ATTENTION. THERE WERE NO INJURIES SUSTAINED TO THE DRIVER OF THE OTHER VEHICLE. THE VEHICLE WAS TOWED TO AN INDEPENDENT MECHANIC. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 62,000.
11166326	GMC	TERRAIN	2011	2019-01-04	MY 2011 GMC TERRAIN HIT A VEHICLE IN FRONT, CAUSING MAJOR DAMAGE (THE VEHICLE IS TOTALED OUT) AND NO AIR BAGS DEPLOYED. MY VEHICLE WAS TRAVELING AT APPROXIMATELY 55 MPH NORTHBOUND IN THE #3 LANE OF THE 41 FREEWAY, SOUTH OF THE SHAW EXIT. IMPACT WAS ESTIMATED TO BE BETWEEN 20 TO 30 MPH. THE DRIVER, MY 18 YEAR GRAND-DAUGHTER HIT HER HEAD ON THE STEERING WHEEL AND HER LEFT WRIST WAS INJURED HOLDING ON TO THE STEERING WHEEL. THE 18 YEAR OLD FEMALE RIGHT FRONT SEAT PASSENGER SUFFERED AN ANKLE INJURY. WHY DID THE AIR BAGS FAIL TO DEPLOY, WITH A STRAIGHT ON FRONT END COLLISION WITH THE VEHICLE IN FRONT?! UNACCEPTABLE!!!
10732291	CADILLAC	SRX	2010	2015-06-22	HIT HEAD ON BY TRUCK GOING APPROX. 45 MPH THAT SWERVED INTO MY CENTER TURN LANE. FRONT END DEMOLISHED - CAR WAS TOTALED - BUT AIR BAGS DID NOT DEPLOY. SEAT BELT DID NOT LOCK ON IMPACT. SIDE OF MY HEAD HIT DRIVER'S WINDOW OR FRAME - WAS CATAPULTED FORWARD AND CAUGHT IN SEAT BELT WHEN IT PULLED OUT ALL THE WAY, RESULTING IN HORRIFIC AND PAINFUL CHEST, ABDOMEN AND LEFT LEG INJURIES (SOFT TISSUE).
10927215	CADILLAC	SRX	2010	2016-11-16	I WAS IN A MINOR COLLISION. RAN INTO THE BACK OF SOMEONE. MY AIRBAGS DIDN'T DEPLOY AND MY ENGINE IMMEDIATELY CAUGHT ON FIRE AND IN A FEW MINUTES MY WHOLE CAR WAS ON FIRE AND DESTROYED. THERE WAS NO KNOWN REASON HOW OR WHY THE FIRE STARTED.
11053454	CADILLAC	SRX	2010	2017-12-02	I WAS IN A CAR ACCIDENT ALONG WITH TWO OTHER PASSENGERS AND NONE OF THE AIR BAGS DEPLOYED

10383428	CHEVROLET	EQUINOX	2010	2011-01-17	ON JAN 17TH,2011 MY VEHICLE WAS WRECKED BY THE DEALER ON SITE OF DEALERSHIP. THE WHOLE FRONT END WAS CAVED IN ON CENTER. THE DRIVER A MECHANIC AT DON WOODS CHEVROLET WAS DRIVING AT A HIGHER THEN NORMAL SPEED. HE HIT A POLE DEAD CENTER AND THE AIR BAG DID NOT DEPLOY. THE DRIVER WAS INJURED TO WHAT EXTENT I AM NOT SURE, BUT I AM NOT WANTING THIS CAR BACK FEELING THE AIRBAG MAY DEPLOY AT ANYTIME DUE TO THE HIT IT TOOK OR IT ISN'T SAFE AND WILL NOT DEPLOY UPON AN ACCIDENT. *TR
10460416	CHEVROLET	EQUINOX	2010	2012-05-18	AS I APPROACHED AN INTERSECTION, I HIT THE REAR END OF A FORD 150 PICK UP TRUCK THAT WAS IN THE INTERSECTION WAITING TO MAKE A LEFT TURN. MY APPROX SPEED WAS 15 MILES PER HOUR. I HAD MY SEATBELT ON, I WAS TAKEN BY AMBULANCE TO THE HOSPITAL - MY EVALUATION REVEALED SPRAIN/STRAIN TO MY NECK, FRACTURED RIGHT ANKLE, AND CHEST WALL DISCOMFORT RELATED TO THE SEAT BELT. THE CAR WAS TOTALED --- THE AIRBAG DID NOT DEPLOY. *TR
10508670	CHEVROLET	EQUINOX	2010	2013-03-25	TL* THE CONTACT OWNS A 2010 CHEVROLET EQUINOX. THE CONTACT STATED THAT WHILE TRAVELING 15 MPH, ANOTHER DRIVER CRASHED INTO THE FRONT DRIVER'S SIDE CORNER OF THE VEHICLE. THE COLLISION CAUSED THE CONTACT TO THEN CRASH INTO A UTILITY POLE. THE AIR BAGS FAILED TO DEPLOY. THE POLICE ARRIVED AND A REPORT WAS FILED. THE CONTACTS INSURANCE COMPANY INSPECTED THE VEHICLE AND ADVISED THE CONTACT THAT THE AIR BAGS SHOULD HAVE DEPLOYED UPON IMPACT. THE CONTACT SUSTAINED A FRACTURED RIB AND INJURY TO THE HEAD. THE VEHICLE WAS DESTROYED. THE FAILURE AND THE CURRENT MILEAGE WAS 42,000. *TR
10746722	CHEVROLET	EQUINOX	2010	2015-07-08	I WAS DRIVING IN TRAFFIC WHEN THE CAR IN FRONT OF ME STOPPED ABRUPTLY IN FRONT OF ME. I REAR ENDED HIM GOING ABOUT 40 MILES PER HOUR. MY AIR BAGS DID NOT INFLATE. I EXITED THE CAR AND BEGAN SPEAKING WITH THE OTHER DRIVER WHEN WE HEARD A POP IN MY CAR. SMOKE STARTING COMING OUT OF THE ENGINE COMPARTMENT AND THEN ALMOST IMMEDIATELY MY CAR ENGINE CAUGHT ON FIRE. THE CAR WAS NOT RUNNING. I INJURED MY KNEE AND SHOULDER IN THE INCIDENT.
10809547	CHEVROLET	EQUINOX	2010	2015-12-08	TL* THE CONTACT OWNED A 2010 CHEVROLET EQUINOX. WHILE DRIVING 35 MPH, THE CONTACT ATTEMPTED TO AVOID HITTING A DEER AND STRUCK THE GUARDRAIL. THE AIR BAGS FAILED TO DEPLOY. THE EMERGENCY ONSTAR SYSTEM RESPONDED AND CALLED THE POLICE AND AMBULANCE. THE VEHICLE WAS TOWED TO A COLLISION CENTER WHERE THE VEHICLE WAS DIAGNOSED AS DESTROYED. THE CONTACT SUSTAINED INJURIES TO THE HEAD, NECK, BACK, AND HANDS. A POLICE REPORT WAS FILED. THE MANUFACTURER WAS NOTIFIED. THE APPROXIMATE FAILURE MILEAGE WAS 57,000.
10928817	CHEVROLET	EQUINOX	2010	2016-11-25	AIRBAGS DID NOT DEPLOY WHEN INVOLVED IN CAR ACCIDENT ON 11/25/2016
10649152	CHEVROLET	SILVERADO	2010	2013-11-14	LETTER FROM CONGRESSMAN WITTMAN ON BEHALF OF CONSTITUENT RE AIRBAGS THAT DID NOT DEPLOY. *SMD 2010 CHEVROLET SILVERADO. THE CONSUMER WAS INVOLVED IN AN ACCIDENT. AS A RESULT, SHE SUSTAINED A BRAIN INJURY.*JB
10315713	CHEVROLET	TRAVERSE	2010	2010-02-25	1. STOPPED AT RED LIGHT IN 2010 CHEVROLET TRAVERSE SUV AND REAR ENDED BY A NISSAN FRONTIER PICK UP TRUCK TRAVELING AT A HIGH RATE OF SPEED. DRIVER'S SEAT BELT ON BUT DRIVER'S HEAD THROWN AGAINST WINDSHIELD AND THEN DRIVER'S BODY SLAMMED AGAINST THE BACK OF THE DRIVER'S SEAT WHICH WAS FORCED BACK TO A RECLINING POSITION. AIRBAG DID NOT DEPLOY. 2. SEAT BELT FAILED TO PREVENT DRIVER'S HEAD FROM HITTING WINDSHIELD IF IT IS SUPPOSED TO IN THIS TYPE OF COLLISION. DID THE SEAT BACK ACT PROPERLY IN SUCH A COLLISION? WAS THE AIRBAG SUPPOSED TO DEPLOY IN THIS TYPE OF COLLISION. 3. IN BODY SHOP TO REPAIR TO PRE-ACCIDENT CONDITION.. *TR
10637484	CHEVROLET	TRAVERSE	2010	2010-07-19	WAS GETTING READY TO PARK ON THE STREET WHEN A CAR HIT ME,I HIT A CAR IN FRONT OF ME,MY CAR WAS THROWN ON THE SIDE WALK,I WAS PASS OUT FOR A FEW SECONDS,BUMP MY HEAD,MY CAR WAS TOTAL, FRONT AND REAR,SURPRISINGLY MY AIR BAG DID NOT DEPLOY TO HELP PROTECT ME FROM MY INJURIES I GOT. *TR
10749869	CHEVROLET	TRAVERSE	2010	2015-08-06	TL* THE CONTACT OWNS A 2010 CHEVROLET TRAVERSE. WHILE DRIVING AT AN UNKNOWN SPEED ATTEMPTING TO MAKE A LEFT TURN, ANOTHER VEHICLE CRASHED INTO THE CONTACTS VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED UNKNOWN INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A SALVAGE YARD. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE APPROXIMATE FAILURE MILEAGE WAS 75,000.
11210243	CHEVROLET	TRAVERSE	2010	2018-12-01	TL* THE CONTACT OWNS A 2010 CHEVROLET TRAVERSE. WHILE DRIVING 30 MPH, THE VEHICLE WAS HIT BY ANOTHER VEHICLE COMING FROM THE OPPOSITE DIRECTION AS IT WAS MAKING A TURN INTO A PARKING LOT. THE CONTACT WAS INJURED BUT NOT TRANSPORTED BY AMBULANCE TO A HOSPITAL SHE WENT TO THE DOCTOR THE SAME DAY. A POLICE REPORT WAS FILED THE VEHICLE WAS TOTALED AND TOWED AWAY TO A SALVAGE LOT. THE FRONTAL AIR BAGS DID NOT DEPLOY DURING THE CRASH.THE FAILURE MILEAGE WAS 103,000. TF
10574295	GMC	TERRAIN	2010	2014-02-21	INVOLVED IN A 21 CAR PILE UP IN THE UPPER PENINSULA DURING A COMPLETE WHITE OUT. WE WERE ONLY TRAVELING APPROXIMATELY 25 MILES PER HOUR BUT, WE DID HAVE SERIOUS IMPACT IN THE FRONT, AFTER HITTING A TRAILER AND ALSO SERIOUS IMPACT FROM BEHIND WHEN HIT BY A TRUCK AND TRAILER. NO AIRBAGS DEPLOYED. THE TRUCK TRAVELING AHEAD OF US, THAT WE HIT, THE AIRBAGS DID DEPLOY. MY FATHER AND BROTHER, WHO WERE ALSO BOTH DRIVING CHEVY TRUCKS, AND ALSO HAD SERIOUS FRONT END DAMAGE DURING THE SAME ACCIDENT, THEIR AIRBAGS DID NOT DEPLOY EITHER. *TR

10810541	GMC	TERRAIN	2010	2015-12-05	TL* THE CONTACT OWNED A 2010 GMC TERRAIN. WHILE DRIVING 45 MPH, THE CONTACT CRASHED INTO THE REAR OF ANOTHER VEHICLE AND THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED FACIAL INJURIES THAT REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE VIN WAS INVALID. THE APPROXIMATE FAILURE MILEAGE WAS 51,000.
10547172	BUICK	ENCLAVE	2009	2009-08-16	GOT INTO A MAJOR ACCIDENT TWO CARS RAN INTO MY VEHICLE AND EVERYONE WAS INJURED AND THE AIR BAGS DID NOT COME ON TO PREVENT THAT. I HAVE INSURANCE AND POLICE REPORT THAT STATES THIS. *TR
10572633	CHEVROLET	EQUINOX	2009	2014-03-11	I HAD PASSED OUT WHILE DRIVING TO WORK DUE TO LOW BLOOD SUGAR. THE FRONT OF MY VEHICLE CRASHED INTO A STRUCTURE AT APPROXIMATELY 55/60 MPH. NONE OF MY AIRBAGS EVER DEPLOYED. I WAS TRANSPORTED TO THE HOSPITAL. *TR
10331539	CHEVROLET	SILVERADO	2009	2010-04-19	TL* THE CONTACT OWNS A 2009 CHEVROLET SILVERADO. THE CONTACT STATED THAT WHILE TRAVELING APPROXIMATELY 35 MPH AND APPROACHING AN INTERSECTION, THE VEHICLE ABNORMALLY VEERED OFF THE ROAD. THE VEHICLE PROCEEDED TO TRAVEL OFF THE ROADWAY AND WENT AIRBORNE OVER AN EMBANKMENT BEFORE CRASHING INTO A DITCH. THE AIR BAGS DID NOT DEPLOY UPON IMPACT AND THE CONTACT SUSTAINED MODERATE TO SEVERE INJURIES. THE CONTACT WAS TRANSPORTED TO THE HOSPITAL VIA AMBULANCE AND A POLICE REPORT WAS FILED ACCORDINGLY. THE VEHICLE WAS TOWED TO A CHEVROLET DEALER FOR REPAIRS. THE FAILURE WAS 13,800 UPDATED 7/16/10 *CN UPDATED 08/18/10
10447821	CHEVROLET	SILVERADO	2009	2011-10-13	TL* THE CONTACT OWNS A 2009 CHEVROLET SILVERADO. THE CONTACT STATED THAT WHILE DRIVING 55 MPH, HE FELL ASLEEP AND LOST CONTROL OF THE VEHICLE. THE VEHICLE CRASHED INTO A CEMENT WALL AND THE FRONT DRIVERS AIR BAG DID NOT DEPLOY. THE CONTACT SUFFERED HEAD INJURIES DURING THE CRASH. THE VEHICLE WAS REPAIRED. THE MANUFACTURER INVESTIGATED THE FAILURE AND CONCLUDED THAT THE AIR BAG PERFORMED AS DESIGNED. THE FAILURE MILEAGE WAS 46,000 AND THE CURRENT MILEAGE WAS 55,000.
10496236	CHEVROLET	SILVERADO	2009	2013-02-01	2009 CHEVY SILVERADO LOST TRACTION ON HIGHWAY DURING SLIPPERY ROAD CONDITIONS, VEHICLE SPUN OUT AND HIT A METAL ROPED FENCE HEAD ON AND ALSO WENT ACROSS THE MEDIAN AND SLAMMED THE FRONT END OF VEHICLE INTO A GUARD RAIL STOPPING IT INSTANTLY FROM GOING INTO ON COMING TRAFFIC. THE VEHICLE'S DAMAGE WAS ON THE FRONT END DIRECTLY IN THE CENTER CAUSING A WEDGE INTO THE RADIATOR, ENGINE AND BENT THE FRONT OF THE FRAME. THE IMPACT WAS VERY LOUD AND SOLID. THE IMPACT CAUSED THE TRUCK TO STAND ON THE FRONT OF VEHICLE, SLAMMING THE BACK END OF THE VEHICLE ON THE GROUND WITH GREAT FORCE. THE AIRBAG DIDN'T DEPLOY WHICH AT THE SPEED OF AROUND 60 MPH AND THE PLACE THE VEHICLE WAS HIT IN, MAKES ME VERY CONCERNED ON THE SAFETY OF THIS VEHICLE. MY 5 YEAR OLD SON SAID HIS RIGHT ARM WAS HURTING AFTER THE ACCIDENT AND WITHIN THE HOUR OF HAVING THE ACCIDENT MYSELF ENDED UP IN THE HOSPITAL WITH A STIFF NECK AND A VERY SOAR AND BRUISED BACK, I WAS RELEASED WITH MINOR INJURIES AND I CONSIDER MYSELF LUCKY. PLEASE LET ME KNOW IF ANYTHING CAN BE DONE ABOUT THIS SITUATION AND THE SAFETY OF MYSELF AND MY SON. *TR
11340458	CHEVROLET	SUBURBAN	2009	2020-02-17	TL* THE CONTACT OWNS A 2009 CHEVROLET SUBURBAN. THE CONTACT STATED THAT WHILE HIS WIFE WAS DRIVING AT A LOW RATE OF SPEED, SHE ATTEMPTED TO MAKE A LEFT TURN AND WAS HIT BY A CAR COMING FROM THE OPPOSITE SIDE. THE AIR BAGS DID NOT DEPLOY UPON IMPACT. THE DRIVER WAS TREATED FOR WHIPLASH AND MULTIPLE BULGED DISKS IN HER BACK WHICH WOULD REQUIRE SURGERY. A POLICE REPORT WAS NOT FILED. THE DRIVER WAS ABLE TO DRIVE THE VEHICLE HOME AFTER THE ACCIDENT. THE CONTACT STATED THAT THE VEHICLE HAD BEEN INCLUDED IN NHTSA CAMPAIGN NUMBER: 16V381000 (AIR BAGS); HOWEVER, THE PARTS TO DO THE REPAIR WERE UNAVAILABLE. THE DEALER NOR THE MANUFACTURER HAD BEEN NOTIFIED OF THE FAILURE. THE VEHICLE HAD YET TO BE REPAIRED. THE FAILURE MILEAGE WAS APPROXIMATELY 167,000.
10944639	CHEVROLET	TRAILBLAZER	2009	2017-01-06	TL* THE CONTACT OWNED A 2009 CHEVROLET TRAILBLAZER. WHILE DRIVING 70 MPH, THE CONTACT'S VEHICLE REAR ENDED ANOTHER VEHICLE. IN TURN, THE CONTACT'S VEHICLE WAS STRUCK BY A SEMI-TRUCK. THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED INJURIES TO THE HEAD, KNEES, AND ARMS, WHICH REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED AND TOWED. THE MANUFACTURER WAS NOT MADE AWARE OF THE CRASH. THE FAILURE MILEAGE WAS 135,000.
11184731	CHEVROLET	TRAILBLAZER	2009	2019-02-22	TRAVELING ON HIGHWAY APPLIED BRAKES AND HIT CAR IN REAR. AIR BAGS NOT DEPLOYED.
10375125	CHEVROLET	TRAVERSE	2009	2010-12-17	TL*THE CONTACT OWNS A 2009 CHEVROLET TRAVERSE. THE CONTACT APPLIED THE BRAKES WHILE DRIVING 35 MPH AND THE VEHICLE CRASH INTO THE REAR END OF THE VEHICLE IN FRONT. THE AIR BAG DID NOT DEPLOY. THE CONTACT SUFFERED A FRACTURED STERNUM BY HITTING THE STEERING WHEEL. THE CONTACT STATED THAT THE SEAT BELT DID NOT LOCK DURING THE CRASH. THE CONTACT WAS TAKEN TO THE HOSPITAL. THE MANUFACTURER STATED THAT THEY WILL PERFORM AN INVESTIGATION REGARDING THE SEAT BELT. THE FAILURE MILEAGE WAS 30,000.

10501339	CHEVROLET	TRAVERSE	2009	2013-02-22	TL* THE CONTACT OWNS A 2009 CHEVROLET TRAVERSE. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 55 MPH, CRASHED INTO A HIGHWAY BARRIER WHILE ATTEMPTING TO AVOID CRASHING INTO ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THE VEHICLE WAS TOWED TO A SALVAGE YARD. THE POLICE REPORTED TO THE SCENE AND A REPORT WAS FILED. THE CONTACT WAS TRANSPORTED TO THE HOSPITAL VIA AMBULANCE FOR TREATMENT OF INJURIES TO THE BACK. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE VIN WAS NOT AVAILABLE. THE APPROXIMATE FAILURE MILEAGE WAS 48,000.
10620828	GMC	ACADIA	2009	2014-07-12	TL* THE CONTACT OWNS A 2009 GMC ACADIA. THE CONTACT STATED WHILE DRIVING 20 MPH THE FRONT PASSENGER SIDE TIRE BLEW AND THE CONTACT LOST CONTROL OF THE VEHICLE, CRASHING INTO A TWO FOOT DITCH. THE VEHICLE THEN WENT THROUGH A ROW OF HEDGES AND CRASHED INTO A TREE ON THE DRIVER'S SIDE. THE SEAT BELT DID NOT RESTRAIN THE CONTACT AND THE AIR BAGS DID NOT DEPLOY. THE REAR SEATS COLLAPSED AS WELL. THE CONTACT SUSTAINED A SEVERE CONCUSSION FROM HITTING HER HEAD ON THE WINDSHIELD, BRUISED LEGS, ARM, FRACTURED NOSE, AND BRUISING TO THE FACE. THE CONTACT WAS FOUND LYING OVER THE CONSOLE AND WAS TAKEN TO THE EMERGENCY ROOM. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS TOWED TO A COLLISION SHOP. THE CONTACT LATER RECEIVED NOTIFICATION OF NHTSA RECALL CAMPAIGN NUMBER 14V266000 (SEAT BELT) HOWEVER, THE PART NEEDED FOR THE REPAIR WAS NOT AVAILABLE. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 120,000.
11308898	GMC	ACADIA	2009	2020-02-07	I WAS DRIVING ON THE MAIN HIGHWAY GOING 35MPH AND ANOTHER VEHICLE PULLED OUT I FRONT OF ME CAUSING ME TO HIT HER WITH MY FRONT END. MY AIRBAGS NEVER DEPLOYED BUT MY SERVICE AIRBAGS LIGHT IS ON AS WELL AS THE MESSAGE ON MY BOARD.
10966352	GMC	YUKON	2009	2017-03-13	TL* THE CONTACT OWNS A 2009 GMC YUKON. WHILE DRIVING 35 MPH, THE CONTACT CRASHED INTO THE DRIVER'S SIDE DOOR OF ANOTHER VEHICLE, WHICH THEN ROLLED OVER. THE AIR BAGS FAILED TO DEPLOY. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE CONTACT SUSTAINED INJURIES TO THE LEFT FOOT, LEFT KNEE, A CONCUSSION, CHEST PAINS, AND A BLACK EYE. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A DEALER WHERE THE FAILURE WAS DIAGNOSED. THE DRIVER OF THE OTHER VEHICLE ALSO SUSTAINED MINOR INJURIES. THE CONTACT HAD NOT RECEIVED NOTIFICATION OF NHTSA CAMPAIGN NUMBER: 16V381000 (AIR BAGS), WHICH WAS ASSOCIATED WITH THE VIN. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 69,000.
11055457	BUICK	ENCLAVE	2008	2017-12-13	TL* THE CONTACT OWNS A 2008 BUICK ENCLAVE. WHILE DRIVING APPROXIMATELY 20 MPH, THE CONTACT LOST CONTROL AND CRASHED HEAD ON INTO ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED INJURIES TO THE HEAD, WHICH REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS TOWED TO THE CONTACT'S RESIDENCE. THE CONTACT WAS NOT SURE IF THE VEHICLE WAS DESTROYED. A LOCAL DEALER AND MANUFACTURER WERE NOT CONTACTED. THE VIN AND FAILURE MILEAGE WERE NOT AVAILABLE.
10632511	CHEVROLET	EQUINOX	2008	2014-05-14	TL* THE CONTACT OWNS A 2008 CHEVROLET EQUINOX. THE CONTACT STATED THAT WHILE DRIVING AT AN UNKNOWN SPEED, THE VEHICLE HYDRO-PLANED AND CRASHED. THE CONTACT MENTIONED THAT NONE OF THE AIR BAGS DEPLOYED. A POLICE REPORT WAS FILED AND INJURIES WERE SUSTAINED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE VEHICLE WAS INSPECTED AND THE TECHNICIAN STATED THAT THE AIR BAGS WERE NOT EXPECTED TO DEPLOY. THE FAILURE MILEAGE WAS 91,000. PAM..UPDATED 09/25/14 *BF UPDATED 10/23/2014*LJ THE CONSUMER STATED THE KEY WAS STUCK IN THE IGNITION. UPDATED 12/08/14 .*JB UPDATED 12/28/15.*JB THE CONSUMER STATED GM CLAIMED TO HAVE INVESTIGATED THE CRASH AND STATED THE AIR BAG WAS NOT DESIGNED TO DEPLOY IN THE TYPE OF CRASH THE CONSUMER WAS INVOLVED IN. UPDATED 01/05/16.*JB UPDATED 06/02/16.*JB *JS
10442223	CHEVROLET	SILVERADO	2008	2011-12-30	TL* THE CONTACT OWNS A 2008 CHEVROLET SILVERADO. THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO A TREE. NEITHER THE DRIVER NOR THE PASSENGER SIDE AIR BAGS DEPLOYED. THE VEHICLE WAS DESTROYED AND THE CONTACT SUSTAINED HEAD AND BACK INJURIES. THE CONTACT DID CALL THE MANUFACTURER. THE FAILURE MILEAGE WAS 66,000. UPDATED 02/15/12*LJ UPDATED 02/24/12
10565014	CHEVROLET	SILVERADO	2008	2014-02-18	7:10 A.M. TUESDAY MORNING, I HIT BLACK ICE AND LOST CONTROL OF MY VEHICLE. I PROCEEDED TO SLIDE UNCONTROLLABLY ACROSS THE ROAD. I THEN HIT A CLIFF WITH THE FRONT END OF MY VEHICLE, ONCE I HIT THE CLIFF MY VEHICLE THEN FLIPPED IN THE AIR AND LANDED ON THE DRIVER SIDE OF THE VEHICLE. ONCE I HAD LANDED ON THE PAVEMENT, ANOTHER VEHICLE CAME ALONG PROCEEDING AT AROUND 45 MPH. THE VEHICLE PROCEEDED TO HIT THE HOOD OF MY VEHICLE. THE DRIVER HIT MY HOOD DIRECTLY WITH THE FRONT END OF HIS VEHICLE. DURING THE WHOLE INCIDENT, I HAD MY SEATBELT ON. ALSO IT WAS INDICATED THAT MY AIR BAGS WERE ONE AND FUNCTIONING CORRECTLY. THE VEHICLE ITSELF WAS TOTALED AND I SUSTAINED WHIPLASH, A SLIGHT CONCUSSION, SEVERE BRUISES AND CUTS, AND ALSO RECEIVED A CHIPPED TOOTH FROM HITTING THE STEERING WHEEL WITH MY FACE. *TR

10672875	CHEVROLET	SILVERADO	2008	2015-01-07	I WAS ON MY WAY HOME FROM WORK AFTER WORKING A VERY LONG DAY AND I FELL ASLEEP AT THE WHEEL AND WENT OFF THE SIDE OF 225. ALL I REMEMBER WAS WAKING UP IN BETWEEN TREES ABOUT TWO FEET AWAY FROM SIMS BAYOU. MY VEHICLE WAS TOTALED. NO AIR BAGS DEPLOYED. *TR
10678613	CHEVROLET	SILVERADO	2008	2015-01-16	2008 CHEVY SILVERADO 4X4 WT. DRIVER SIDE AIRBAG DID NOT DEPLOY DURING CRASH. VEHICLE IMPACT WAS ON THE FRONT. A FATALITY OCCURRED DURING THIS CRASH. (PASSENGER IN OTHER VEHICLE) POINT OF IMPACT WAS FRONT OF SILVERADO INTO PASSENGER SIDE OF OTHER VEHICLE. *TR
10681040	CHEVROLET	SILVERADO	2008	2015-01-21	TL* THE CONTACT OWNS A 2008 CHEVROLET SILVERADO. THE CONTACT STATED THAT THE AIR BAGS FAILED TO DEPLOY AFTER BEING INVOLVED IN A CRASH. THE SPECIFICS OF THE CRASH WERE NOT AVAILABLE. A POLICE REPORT WAS FILED AND THE DRIVER SUSTAINED INJURIES TO THE HEAD, THE NECK, AND THE BACK THAT DID NOT REQUIRE MEDICAL ATTENTION. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 111,687.
10761080	CHEVROLET	SILVERADO	2008	2015-08-25	TL* THE CONTACT OWNED A 2008 CHEVROLET SILVERADO. WHILE DRIVING 65 MPH, THE CONTACT FELL ASLEEP BEHIND THE WHEEL AND THE VEHICLE DROVE OFF THE ROAD. THE CONTACT CRASHED INTO THE SUPPORT CABLES ON THE SIDE OF THE ROAD. THE CONTACT STATED THAT THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THERE WERE NO INJURIES. THE VEHICLE WAS TOWED TO AN INDEPENDENT MECHANIC WHERE IT WAS DEEMED DESTROYED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 127,000.
10261711	CHEVROLET	TRAILBLAZER	2008	2009-03-07	TL*THE CONTACT OWNS A 2008 CHEVROLET TRAILBLAZER. WHILE DRIVING 35 MPH, THE CONTACT WAS INVOLVED IN A HEAD-ON CRASH. THE ENTIRE FRONT END OF HIS VEHICLE WAS CRUSHED AND THE INSURANCE COMPANY DECLARED THE VEHICLE AS DESTROYED. THE SEAT BELTS PROPERLY RESTRAINED THE CONTACT, BUT THE AIR BAGS FAILED TO DEPLOY. THERE WERE NO INJURIES, BUT A POLICE REPORT WAS FILED. THE FAILURE MILEAGE WAS 6,500.
10679071	CHEVROLET	TRAILBLAZER	2008	2015-01-18	THE VEHICLE LOST CONTROL ON BLACK ICE, THE STEERING WHEEL AND BRAKES LOCKED UP AND THE TRAILBLAZER HIT A TREE.THE AIRBAG NEVER DEPLOYED. THE VEHICLE'S FRAME WAS BENT. THE SUV WAS CONSIDERED A TOTAL LOSS. THE VEHICLE PICKED UP A LITTLE MORE SPEED WHILE ON THE ICE, BUT NO MORE THAN 30 MPH. *TR
11143666	CHEVROLET	TRAILBLAZER	2008	2018-10-19	WAS TRAVELING 40 MPH AND WAS HIT HEAD ON BY ANOTHER VEHICLE. NONE OF THE AIR BAGS DEPLOYED. WAS ON A CITY STREET WITH A 40 MPH SPEED LIMIT. GOING STRAIGHT.
11324166	CHEVROLET	TRAILBLAZER	2008	2020-05-05	TL* THE CONTACT OWNED A 2008 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT HE CRASHED AND REAR ENDED INTO ANOTHER VEHICLE STOPPED AT A STOP LIGHT AT 53 MPH. THE CONTACT STATED THAT THE AIR BAGS FAILED TO DEPLOY AS WELL AS THE SEAT BELT PRETENSIONER FAILED TO ENGAGE. THE CONTACT SUSTAINED A SEVERE CONCUSSION & ALMOST BIT HIS TONGUE OFF WITH HIS HEAD SMASHING INTO THE WINDSHIELD. HE ALSO SUSTAINED CUTS AND BRUISES ON HIS LOWER BODY AND LEGS AND A BRUISED NECK. THERE WAS A PASSENGER IN THE OTHER VEHICLE THAT HAD TO BE TRANSPORTED TO THE HOSPITAL WITH INJURIES AS WELL. THE VEHICLE WAS TOTALED WITH THE WHOLE FRONT SMASHED IN UP TO THE WINDSHIELD. THE DEALER AND MANUFACTURER HAD NOT BEEN CONTACTED YET. THE FAILURE MILEAGE WAS 220,000. THE VIN WAS NOT AVAILABLE. *LN*JB
10615043	GMC	ACADIA	2008	2013-04-30	TL* THE CONTACT OWNS A 2008 GMC ACADIA. THE CONTACT STATED THAT WHILE DRIVING 50 MPH, THE VEHICLE WAS INVOLVED IN A FRONT END CRASH IN WHICH NO AIR BAGS DEPLOYED. A POLICE REPORT WAS FILED AND NO INJURIES WERE SUSTAINED. THE VEHICLE WAS TAKEN TO A DEALER. THE FAILURE MILEAGE WAS 113,000 AND THE CURRENT MILEAGE WAS 132,653.
11066850	GMC	ACADIA	2008	2015-08-21	MY WIFE FELL ASLEEP RAN OFF THE ROAD STRUCK A UTILITY POLE AND A LARGE DIRT EMBANKMENT. THE AIR BAGS DID NOT DEPLOY NOR DID THE BELT TENSIONERS,SHE HIT THE STEERING COLUMN SO HARD SHE IT BROKE THE COLUMN AND BROKE HER STERNUM. OUR GRANDDAUGHTER WAS IN THE FRONT PASSENGER SEAT THE AIR BAG NOR THE TENNSIONERS DEPLOYED RESULTING HER BACK BEING BROKEN IN TWO PLACES AND ALSO HER FOOT WAS BROKEN. I CONTACTED GENERAL MOTORS AND THEY SENT A MAN TO DOWNLOAD THE COMPUTER INFORMATION THEY SENT ME A COPY OF THE INFO AND LATER CONTACTED ME SAYING THE INFO SHOWED EVERYTHING WAS WORKING PROPERLY. PRYOR TO THE ACCIDENT I HAD THE AUTO IN FOR THE RECALL ON THIS PROBLEM. I ALSO HAD IT IN FOR ANOTHER RECALL FOR THE HEADLIGHTS AND THEY HAD TO REMOVE A LARGE PART OF THE FRONT TO DO THE REPAIR AND DONE A POOR JOB OF PUTTING IT BACK TOGETHER I RETURNED IT AND THEY FINALLY GOT IT RIGHT,IN THE MEAN TIME THE SERVICE AIR BAG LIGHT CAME ON AND THEY REPAIRED THAT.LATER AFTER THE ACCIDENT I WENT BACK TO THE DEALER AND QUESTIONED THE BODY SHOP MANAGER ABOUT PUTTING IT BACK TOGETHER PROPERLY AND THEN TOLD HIM ABOUT THE ACCIDENT THEN HE HAD NOTHING ELSE TO SAY. THE AUTO WAS A TOTAL LOSS AFTER A LENGTH OF TIME WIFE AND GRANDDAUGHTER GOT OUT OF HOSPITAL. THIS CAR WAS RECALLED FOR THIS VERY REASON. MY INSURANCE COMPANY PAID MY GRANDDAUGHTER \$95,000 FOR HER INJURIES AND COMMENTED THAT THEY WOULD PROBABLY SUE GM TO GET THAT BACK.

					VEHICLE WAS SOUTHBOUND ON COUNTY ROAD AND ATTEMPTED TO MAKE A RIGHT TURN AT THE INTERSECTION, WHEN THE CAR STRUCK THE SOUTH EMBANKMENT OF THE T INTERSECTION, AS DRIVER WAS UNABLE TO NAVIGATE THE TURN. NONE OF THE SIDE OR FRONT AIRBAGS IN THE CAR DEPLOYED AS A RESULT OF THE CRASH. I AM ALSO UNSURE IF THE SEAT BELT HAD OPERATED CORRECTLY (SEAT BELT WAS BEING WORN AT THE TIME OF THE CRASH). THE DRIVER'S HEAD HIT THE SIDE WINDOW AND AS A RESULT HE SUSTAINED A HEAD INJURY AND AN EYE INJURY RESULTING IN OPTIC NERVE DAMAGE AND COMPLETE LOSS OF VISION IN THE EYE. I UNDERSTAND THERE WERE PROBLEMS WITH THE AIRBAGS ON THESE VEHICLES WITH A POSSIBLE RECALL ISSUED. I DO HAVE ALL THE CORRESPONDING ACCIDENT REPORTS, MEDICAL REPORTS, ETC.
11310375	GMC	ACADIA	2008	2015-11-26	
10667413	GMC	ENVOY	2008	2014-12-19	I WAS IN AN AUTO ACCIDENT ON A MAJOR HIGHWAY AND UPON CRASHING MY AIRBAG DIDN'T DEPLOY AND MY FACE SMASHED INTO THE STEERING WHEEL.
11143613	GMC	ENVOY	2008	2018-10-24	ON 10/24/2018 WHILE DRIVING MY 2008 GMC ENVOY SLT, I WAS INVOLVED IN A HEAD-ON COLLISION WHICH RESULTED IN MY CAR BEING TOTALED. NONE OF MY AIR BAGS DEPLOYED.
11080754	GMC	YUKON XL	2008	2017-01-08	TL* THE CONTACT OWNS A 2008 GMC YUKON XL. WHILE DRIVING 65 MPH, THE CONTACT NOTICED THAT ANOTHER VEHICLE WAS SWERVING TOWARDS HER VEHICLE. THE CONTACT HAD TO DEPRESS THE ACCELERATOR PEDAL TO INCREASE SPEED AND AVOID A COLLISION; HOWEVER, THE OTHER VEHICLE LOST CONTROL AND CRASHED INTO THE CONTACT'S VEHICLE. THE FRONT FRAME, FRONT PASSENGER SIDE, AND REAR FRAME OF THE CONTACT'S VEHICLE WERE DAMAGED. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT WAS KNOCKED UNCONSCIOUS AND REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED FROM THE SCENE. THE CONTACT STATED THAT THE VEHICLE WAS INSPECTED BY A MECHANIC FRIEND WHO CONFIRMED THE AIR BAGS FAILED TO DEPLOY. THE VEHICLE WAS NOT REPAIRED. THE DEALER WAS NOT CONTACTED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND A CASE WAS OPENED. THE CONTACT STATED THAT THE CASE HAD CLOSED. THE APPROXIMATE FAILURE MILEAGE WAS 150,000.
10207326	CADILLAC	ESCALADE	2007	2007-10-06	TL*THE CONTACT OWNED A 2007 CADILLAC ESCALADE. THE CONTACT FELL ASLEEP WHILE DRIVING AT AN UNKNOWN SPEED. THE VEHICLE STRUCK A DITCH, WENT AIRBORNE, AND ROLLED OVER SEVERAL TIMES. A POLICE REPORT WAS FILED. ALL FOUR WHEELS AND TIRES CAME OFF THE VEHICLE AND EACH WINDOW WAS BROKEN AND SMASHED. NONE OF THE EIGHT AIR BAGS DEPLOYED. THE CONTACT SUSTAINED A BROKEN COLLAR BONE, SHOULDER BONE, ROTARY CUP, AND A BROKEN HAND IN TWO PLACES. THE INSURANCE COMPANY STATED THAT THE VEHICLE WAS DESTROYED. CADILLAC HAS BEEN NOTIFIED AND WILL INSPECT THE VEHICLE. THE CURRENT AND FAILURE MILEAGES WERE 28,000.
10226642	CADILLAC	ESCALADE	2007	2008-04-26	TL*THE CONTACT OWNS A 2007 CADILLAC ESCALADE. WHILE DRIVING 35 MPH IN THE RAIN, THE VEHICLE HYDROPLANED AND CRASHED INTO SEVERAL TREES. THE VEHICLE SPUN AROUND AND ENDED UP FACING THE OPPOSITE DIRECTION. THE AIR BAGS FAILED TO DEPLOY AND THE CONTACT WAS INJURED. A POLICE REPORT WAS FILED. THE FAILURE MILEAGE WAS UNKNOWN.
10292325	CADILLAC	ESCALADE	2007	2009-11-14	TL* THE CONTACT OWNS A 2007 CADILLAC ESCALADE. WHILE DRIVING SHE CRASHED INTO A TREE. THE ENTIRE FRONT-END OF THE VEHICLE WAS DAMAGED, AND NONE OF THE AIR BAGS DEPLOYED. CONSEQUENTLY SHE RECEIVED INJURIES TO HER NECK. A POLICE REPORT WAS FILED. ALSO THE FRONT BRAKE PADS FRACTURED WITHIN THE FIRST TWO MONTHS OF PURCHASING THE VEHICLE. THE BRAKE PADS WERE REPLACED UNDER THE SERVICE WARRANTY. THE FAILURE AND CURRENT MILEAGES WERE 58,000.
10317216	CHEVROLET	EQUINOX	2007	2010-03-03	I WAS IN AN ACCIDENT WHERE I STRUCK TWO HORSES THAT RUN OUT INTO THE HIGHWAY IN FRONT OF ME IN MY 2007 CHEVROLET EQUINOX LSI. THE FIRST HORSE STRUCK MY PASSENGERSIDE FRONT QUARTER PANEL AND THIS CAUSED ME TO SWERVE INTO ANOTHER HORSE ON THE DRIVER SIDE. I WAS TRAVELING AT APPROXIMATELY 50 MPH AND THE DAMAGE TO THE FRONT OF MY CAR WAS VERY SERIOUS AND MY COMPLAINT IS THAT THE AIRBAGS NEVER DEPLOYED DURING THE CRASH. I KNOW THAT THE AIRBAGS ARE SET OF BY SPECIFIC SPEEDS AND DAMAGE BUT MY WHOLE FRONT OF MY 2007 CHEVROLET EQUINOX LS WAS NEARLY REMOVED. I WAS WEARING MY SAFETY BELT AND IT OFFERED LITTLE HELP SINCE I WAS HIT TWICE FROM OPPOSITE SIDES. I WAS TOLD BY RESPONDING EMERGENCY CREW THAT THE AIRBAG MUST HAVE BEEN FAULTY SINCE IT DID NOT DEPLOY. *TR
10370521	CHEVROLET	EQUINOX	2007	2010-12-13	AUTOMOBILE ACCIDENT AT ROUGHLY 20 MILES AN HOUR IN A 2007 CHEVY EQUINOX MOSTLY FRONT END AND DRIVER SIDE DAMAGE. THE AIR BAGS DID NOT DEPLOY. MAJOR FRONT END DAMAGE SUSTAINED. *TR
11128142	CHEVROLET	EQUINOX	2007	2018-05-28	TL* THE CONTACT OWNED A 2007 CHEVROLET EQUINOX. WHILE DRIVING 20 MPH, THE CONTACT CRASHED INTO A CONCRETE EMBANKMENT TO AVOID COLLIDING WITH ANOTHER VEHICLE. THE AIR BAG FAILED TO DEPLOY. THE CONTACT SUSTAINED INJURIES TO THE RIGHT SHOULDER AND LEFT ARM THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS DESTROYED AND TOWED TO A TOW LOT. THE CONTACT CALLED ALLEN TILLERY AUTO (LOCATED AT 4573 CENTRAL AVE, HOT SPRING, AR 71913, (501) 881-4160) AND WAS INFORMED THAT THE AIR BAG SHOULD HAVE DEPLOYED SINCE IT WAS JUST INSTALLED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND DID NOT ASSIST. THE APPROXIMATE FAILURE MILEAGE WAS 135,000.

10331536	CHEVROLET	SILVERADO	2007	2007-09-07	TL* THE CONTACT OWNS A 2007 CHEVROLET SILVERADO. THE CONTACT STATED THAT WHILE TRAVELING APPROXIMATELY 35 MPH, A VEHICLE AHEAD OF HIM MADE AN UNEXPECTED LEFT TURN. THE CONTACT CRASHED INTO THE THE PRECEDING VEHICLE AND THE AIR BAGS DID NOT DEPLOY UPON IMPACT. THE CONTACT WAS INJURED AND A POLICE REPORT WAS FILED ACCORDINGLY. THE VEHICLE WAS TOWED TO A LOCAL DEALER WHERE UNKNOWN REPAIRS WERE MADE THE VEHICLE WAS TRADED IN. THE VIN WAS NOT AVAILABLE AND THE FAILURE MILEAGE WAS APPROXIMATELY 28,000. UPDATED 07/19/10 *BF UPDATED 07/21/10
10585572	CHEVROLET	SILVERADO	2007	2014-04-22	TL* THE CONTACT OWNS A 2007 CHEVROLET SILVERADO. THE CONTACT STATED THAT WHILE DRIVING 45 MPH, THE VEHICLE HYDRO PLANED AND THE CONTACT CRASHED INTO THE ROAD BARRIER. NO AIR BAGS DEPLOYED UPON IMPACT. THERE WERE FOUR INJURIES AND A POLICE REPORT WAS FILED. INJURY DETAILS WERE NOT AVAILABLE. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE AND CURRENT MILEAGE WAS 102,000.
10606814	CHEVROLET	SILVERADO	2007	2014-06-12	ON IMPACT TO FRONT END OF MY VEHICLE THE AIR BAGS DID NOT DEPLOY. THE AIR BAGS ON THE OTHER VEHICLE DID DEPLOY. HOW CAN I BE SURE MY AIRBAGS ARE FUNCTIONING PROPERLY. THERE IS ABOUT \$9,000 DAMAGE TO MY VEHICLE. I AM SENDING AGAIN BECAUSE I AM NOT CERTAIN THE FIRST ONE WENT THROUGH. *TR
10608220	CHEVROLET	SILVERADO	2007	2012-08-17	VEHICLE WAS INVOLVED IN HEAD ON COLLISION THAT TOTALED IT. OTHER VEHICLE WAS AN OLDER MODEL VAN, DO NOT KNOW EXTENT OF DAMAGES TO IT. MY CONCERN IS THE AIR BAGS DID NOT DEPLOY WAS TOLD BY GM THAT CRASH DID NOT MEET CRITERIA FOR DEPLOYMENT!!!! A HEAD ON COLLISION AT 50 MPH THAT TOTALED 2500 SERIES CHEVY TRUCK. HARD FOR ME TO BELIEVE I NOW OWN A 2008 CHEVY 1500 SERIES, DO I NEED TO BE CONCERNED? *TR
10649638	CHEVROLET	SILVERADO	2007	2014-09-29	TL* THE CONTACT OWNS A 2007 CHEVROLET SILVERADO 1500. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 15 MPH, THE VEHICLE CRASHED INTO A TREE CAUSING EXTENSIVE DAMAGE TO THE FRONT END. THE CONTACT INDICATED THAT DURING THE CRASH THE FRONT AIR BAGS DID NOT DEPLOY AND THE DRIVER SUFFERED INJURIES TO THE RIGHT KNEE, WHILE THE FRONT PASSENGER SUFFERED INJURIES TO BOTH KNEES AND HEAD. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 95,000.
10512756	CHEVROLET	SUBURBAN	2007	2013-05-19	WE WERE DRIVING HOME WHEN A PERSON RAN A RED LIGHT AND HIT US. WE WERE CROSSING AN INTERSECTION ABOUT 15 MILES AN HOUR AND THEY HIT THE FRONT PART OF OUR SUBURBAN. EVERYTHING WAS DAMAGED THE HOOD, AND EVERYTHING INSIDE THE HOOD SUSTAINED DAMAGE. THERE WAS A LIQUID THAT WAS LEAKING BUT I AM UNAWARE OF THE SUBSTANCE. THE PERSON THAT HIT US MUST HAVE BEEN GOING ABOUT 40-60 MILES AN HOUR. AFTER THEY FLED THE SEEN POLICE MENTIONED THAT THEIR AIR BAGS WERE DEPLOYED. MY CONCERN WAS WHY OUR AIR BAGS DID NOT DEPLOY AS WELL. MY DAUGHTER AND I BOTH HIT OUR HEADS ON OUR SIDE WINDOWS. MY SON HAD SLIGHT INJURY MOSTLY FROM THE SEATBELT. MY SON'S DOOR HAD TO BE OPENED FROM THE POLICE OFFICER ON THE SCENE. MY BIGGEST CONCERN WAS ABOUT THE AIRBAGS AND ALSO THE ONSTAR DID NOT WORK AS WELL. *TR
10400538	CHEVROLET	TAHOE	2007	2010-03-19	TL* THE CONTACT OWNS A 2007 CHEVROLET TAHOE. THE CONTACT STATED THAT THE VEHICLE WAS INVOLVED IN A FRONTAL CRASH WITH ANOTHER VEHICLE AT APPROXIMATELY 30 MPH BUT THE AIR BAGS DID NOT DEPLOY. THE DRIVER OF THE CONTACT'S VEHICLE AND A PASSENGER SUFFERED MINOR INJURIES. THE VEHICLE WAS DESTROYED AND A POLICE REPORT WAS FILED. THE CONTACT CALLED THE MANUFACTURER WHO TOOK A COMPLAINT BUT PROVIDED NO FURTHER ASSISTANCE. THE CURRENT AND FAILURE MILEAGES WERE UNKNOWN. THE VIN WAS UNAVAILABLE.
10659540	CHEVROLET	TAHOE	2007	2014-03-16	2007 CHEVROLET TAHOE. AIRBAG DEPLOYMENT FAILURE DURING AN ACCIDENT. *TA
10811111	CHEVROLET	TAHOE	2007	2014-04-17	TL* THE CONTACT OWNS A 2007 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING 50 MPH, THE CONTACT BLACKED OUT AND CRASHED INTO THE GUARDRAIL. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED HEAD INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. ON ANOTHER OCCASIONS, WHILE MAKING A LEFT TURN AT 15 MPH, THE CONTACT CRASHED INTO ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED AND THERE WERE NO INJURIES REPORTED. THE CONTACT ALSO STATED THAT THERE WERE TWO LARGE CRACKS IN THE DASHBOARD AND A THIRD CRACK DEVELOPED AS A RESULT OF THE FIRST CRASH. THE VEHICLE WAS TAKEN TO A DEALER HOWEVER, THE DIAGNOSIS WAS UNKNOWN. THE VEHICLE WAS REPAIRED AFTER BOTH FAILURES. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 120,000.
10821342	CHEVROLET	TAHOE	2007	2015-11-16	CRACKED DASH, POTENT HAZARD OF PLASTIC DASH PIECES BECOMING AIRBORNE SHRAPNEL IN THE EVENT OF CRASH WITH AIR BAGS DEPLOY. 2007 TAHOE DASH HAD SMALL 6 INCH CRACK AT THE 2 O'CLOCK POSITION ON DRIVERS SIDE INSTRUMENT CLUSTER AND SMALL 1 INCH CRACK ON RIGHT SIDE OF PASSENGER SIDE AIRBAG. AFTER 25 MPH HEAD ON CRASH AIR BAGS DIDN'T DEPLOY BUT ADDITIONAL CRACKS HAVE APPEARED. NOW 10 X WORST. PICS WILL SHOW. DEALER DOESN'T WANT TO REPLACE NOR INSURANCE COMPANY.
10854032	CHEVROLET	TAHOE	2007	2016-03-31	TAHOE WAS INVOLVED IN FRONT COLLISION WITH ANOTHER VEHICLE AND BAGS DID NOT DEPLOY. BUMPER, HOOD DAMAGED. BUMPER METAL BRACKET PUSHED IN. TAHOE WAS TURNING LEFT ON LIGHT WHEN STRUCK BY ANOTHER VEHICLE LIKE HEAD ON.

10959039	CHEVROLET	TAHOE	2007	2017-02-01	TL* THE CONTACT OWNS A 2007 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 60 MPH, THE CONTACT'S VEHICLE CRASHED INTO THE REAR OF A SECOND VEHICLE. DURING THE CRASH, THE FRONT END OF THE VEHICLE SUSTAINED SIGNIFICANT DAMAGE. THE AIR BAGS DID NOT DEPLOY. THE DRIVER SUSTAINED INJURIES TO THE BACK, SHOULDERS, ARMS, LEFT LEG, AND KNEE. THE PASSENGER SUFFERED INJURIES TO BOTH KNEES. MEDICAL ATTENTION WAS RECEIVED. A POLICE REPORT WAS FILED. THE CAUSE OF THE FAILURE WAS NOT DIAGNOSED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE VIN WAS NOT AVAILABLE. THE FAILURE MILEAGE WAS 100,000.
11265920	CHEVROLET	TAHOE	2007	2019-07-16	TL* THE CONTACT OWNED A 2007 CHEVROLET TAHOE. WHILE DRIVING 35 MPH, A 2012 NISSAN FRONTIER SIDESWIPE THE CONTACT'S VEHICLE. THE CONTACT VEERED OFF THE ROAD AND CRASHED INTO A LIGHT POLE. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED HEAD, BACK, NECK, HAND, AND KNEE INJURIES. MEDICAL ATTENTION WAS RECEIVED. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO AN INDEPENDENT LOT. THE CONTACT CALLED PATTERSON HYUNDAI TYLER (3120 S SW LP, TYLER, TX 75701, (903) 561-2404) AND INFORMED THEM OF THE FAILURE. THE VEHICLE WAS NOT DIAGNOSED. THE MANUFACTURER WAS NOT CONTACTED. THE VEHICLE WAS DEEMED A TOTAL LOSS BY THE INSURANCE COMPANY. THE FAILURE MILEAGE WAS 128,122.
10252163	CHEVROLET	TRAILBLAZER	2007	2008-09-24	ON 9/24/08 I WAS INVOLVED IN AN AUTO ACCIDENT WHERE MY 2007 CHEVROLET TRAILBLAZER'S AIRBAGS FAILED TO DEPLOY. MY VEHICLE IMPACTED ANOTHER WITH MY ENTIRE FRONT END AT APPROXIMATELY 45 MPH. MY TRAILBLAZER WAS TOTALED. NOT ONLY DID MY AIRBAGS FAIL TO DEPLOY, THE ONSTAR SYSTEM DID NOT AUTOMATICALLY GO OFF. I HAD TO HIT THE BUTTON TO SUMMON ASSISTANCE. WHEN WE ASKED THE DEALER ABOUT IT, THEIR RESPONSE WAS "SOMETIMES THEY GO OFF, SOMETIMES THEY DON'T" I SUSTAINED A BROKEN LEFT ARM, NUMEROUS BRUISES, A CUT ON MY ANKLE AND AN ANKLE SPRAIN. I ALSO INJURED MY BACK AND NECK WHICH IS REQUIRING ONGOING CARE. *TR
10289962	CHEVROLET	TRAILBLAZER	2007	2009-10-18	AIRBAGS DID NOT DEPLOY IN CRASH IMPACT ESTIMATED AT APROX 60 MPH. VEHICLES AIRBAG THAT DID NOT DEPLOY WAS A FRONTAL CRASH. T-BONED ANOTHER VEHICLE THAT PULLED OUT IN FRONT OF MENTIONED VEHICLE. *TR
10478475	CHEVROLET	TRAILBLAZER	2007	2012-05-14	TL* THE CONTACT OWNS A 2007 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING 40 MPH, THE CONTACT CRASHED HEAD ON INTO ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT WAS TAKEN TO THE HOSPITAL FOR TREATMENT OF WHIPLASH AND EYE INJURIES. THE ENTIRE FRONT END OF THE VEHICLE WAS SEVERELY DAMAGED. THE POLICE WERE NOTIFIED AND A REPORT WAS FILED. THE MANUFACTURER WAS NOTIFIED AND A REPRESENTATIVE WAS SENT TO INSPECT THE VEHICLE, STATING THAT THE VEHICLE PERFORMED AS DESIGNED. THE VIN WAS UNKNOWN. THE FAILURE MILEAGE WAS 64,056.
10482863	CHEVROLET	TRAILBLAZER	2007	2012-05-13	TL* THE CONTACT OWNS A 2007 CHEVROLET TRAILBLAZER. THE CONTACT STATED HE WAS GETTING SICK WHILE DRIVING AND CRASH INTO ANOTHER VEHICLE. THE CONTACT STATED THAT THE AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS NOT DESTROYED AND THERE WAS A POLICE REPORT FILED. THE CONTACT SUSTAINED A WHIPLASH INJURY AND SEVERE HEADACHE. THE MANUFACTURER WAS NOTIFIED WHO SENT A TECHNICIAN TO LOOK AT THE VEHICLE AND THEY STATED THAT THE AIR BAGS FUNCTIONED PROPERLY. THE FAILURE MILEAGE WAS 65,000. UPDATED 01/10/13*LJ UPDATED 1/11/13 *JS
10661436	CHEVROLET	TRAILBLAZER	2007	2014-12-01	TL* THE CONTACT OWNED A 2007 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 20 MPH, ANOTHER VEHICLE CRASHED INTO THE CONTACTS VEHICLE WHILE CROSSING AN INTERSECTION. THE AIR BAGS FAILED TO DEPLOY. THE VEHICLE WAS DESTROYED. IT WAS UNKNOWN IF ANY INJURIES WERE SUSTAINED OR IF A POLICE REPORT WAS FILED. THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 140,000. THE VIN WAS UNAVAILABLE.
10661920	CHEVROLET	TRAILBLAZER	2007	2014-11-12	TL* THE CONTACT OWNS A 2007 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING AT APPROXIMATELY 20 MPH CROSSING AN INTERSECTION, ANOTHER VEHICLE CRASHED INTO THE CONTACTS VEHICLE AND THE AIR BAGS FAILED TO DEPLOY. THE VEHICLE WAS DESTROYED. NO INJURIES WERE REPORTED. THE MANUFACTURER WAS NOT NOTIFIED OF THE ISSUE. THE FAILURE MILEAGE WAS 140,000. THE VIN WAS UNAVAILABLE.
10664216	CHEVROLET	TRAILBLAZER	2007	2014-05-17	IT WAS RAINING AND WE WERE ON OUR WAY HOME DRIVING DOWN THE HIGHWAY AND HIT A WATER PUDDLE AND HYDROPLANED OF THE SIDE OF THE ROAD THE TRUCK CUT OFF AND SPENT AROUND HIT A TREE HEAD ON AND THE AIRBAGS DIDN'T DEPLOY. I WAS HOSPITALIZED WITH MULTIPLE INJURIES AND IM STILL SUFFERING. *TR
10715742	CHEVROLET	TRAILBLAZER	2007	2015-04-27	A VEHICLE WAS STOPPED IN FRONT OF ME AND I REAR ENDED THEM. I WAS GOING AROUND 44-55 MPH. AFTER I HIT THE OTHER CAR FROM BEHIND I CROSSED 2 LANES OF TRAFFIC AND WENT THRU A PRETTY DEEP DITCH. THE AIR BAGS DID NOT DEPLOY AT ALL. I SUSTAINED A CONCUSSION., SEVERAL HEAD LACERATIONS AND A FRACTURED LUMBAR SPINE.
10733714	CHEVROLET	TRAILBLAZER	2007	2015-07-04	SWERVED TO AVOID HITTING A DEER ALMOST HIT MAILBOXES SO SWERVED TO AVOID THEM. I SWERVED TO MUCH THAN IN MY CORRECTION HIT THE GAS INSTEAD OF THE BRAKE. I THAN HIT A TREE BETWEEN 45 - 50 MPH. MY AIRBAGS NEVER DEPLOYED.

10934884	CHEVROLET	TRAILBLAZER	2007	2016-12-07	I HAD MY CRUISE SET ON 55 MPH AND WAS HIT HEAD ON BY VW JETTA PULLING OUT TOWARD MY VEHICLE, THEN FORCED TO LEFT INTO A TELEPHONE POLE. AIRBAGS DIDN'T DEPLOY, AND RECEIVED BROKEN STERNUM. DON'T KNOW IF SEATBELT INJURED ME, OR IF THE SEATBELT DIDN'T LOCK ON 2ND IMPACT AND POSSIBLY HIT THE STEERING WHEEL.
10208661	GMC	ACADIA	2007	2007-10-12	INVOLVED IN FRONTAL COLLISION WITH CONSIDERABLE DAMAGE, BUT AIR BAG DID NOT DEPLOY. *TR
10498046	GMC	ACADIA	2007	2013-02-09	TL* THE CONTACT OWNS A 2007 GMC ACADIA. THE CONTACT STATED THAT WHILE DRIVING 20 MPH, ANOTHER VEHICLE CRASHED INTO HIS VEHICLE IN THE MIDDLE OF THE INTERSECTION. UPON IMPACT, THE AIR BAGS FAILED TO DEPLOY. THE CONTACT STATED THAT HE WAS PINNED IN THE VEHICLE AND COULD NOT GET OUT. THE VEHICLE HAD SEVERE DAMAGES TO THE DRIVER SIDE AND WAS COMPLETELY DESTROYED. THE CONTACT SUSTAINED INJURIES TO HIS HEAD AND CHEST. THE CONTACT WAS TAKEN TO THE EMERGENCY ROOM BY FAMILY. THE POLICE WERE NOTIFIED AND A REPORT WAS AVAILABLE IF NEEDED. THE MANUFACTURER WAS NOTIFIED WHO STATED THAT A REPRESENTATIVE WILL GIVE HIM A RETURN CALL. THE FAILURE MILEAGE WAS 91,000. UPDATED 3/10/13 *CN
10959190	GMC	ACADIA	2007	2017-03-02	TL* THE CONTACT OWNED A 2007 GMC ACADIA. WHILE MAKING A LEFT TURN AT APPROXIMATELY 5 MPH FROM A STOP SIGN, A SPEEDING VEHICLE CRASHED HEAD-ON INTO THE FRONT CENTER OF THE CONTACT'S VEHICLE. THE AIR BAGS DID NOT DEPLOY. BOTH THE CONTACT AND A MINOR PASSENGER, SEATED IN THE REAR BEHIND THE DRIVER, SUSTAINED INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE CONTACT'S VEHICLE WAS TOTALED AND WAS TOWED TO A TOW YARD. THE FAILURE MILEAGE WAS APPROXIMATELY 140,000.
10604975	GMC	ENVOY	2007	2014-06-20	MY WIFE WAS DRIVING HOME FROM THE DOCTOR AND A FULL SIZE CHEVY CAME ACROSS ON HER SIDE AND HIT HER HEAD ON NEITHER AIR BAG DEPLOYED ON THE ENVOY BOTH VEHICLES WAS TOTALED WHAT SHOULD WE DO THANKS. *TR
10639641	GMC	ENVOY	2007	2014-04-27	A GUY HIT ME ON THE DRIVERS SIDE THEN IT PUSHED ME INTO A DRIVEWAY OF A BUSINESS WHICH HAD A BRICK WALL WHICH I HIT &BOUNCED OFF IT .POPPED BOTH TIRES ON THE DRIVERS SIDE. THEN I HIT A TELEPHONE POLE STRAIGHT ON &SMASHED IN MY FRONT ON MY CAR..I MOVED THE TELEPHONE POLE IN THE CONCRETE ABOUT 2 IN..I WAS THE SECOND OWNER. THE OTHER OWNER WAS THE DEALERSHIP &THY HAD IT JUST FOR THERE CAR TO RUN FROM 1 DEALERSHIP TO THE OTHER..I HAD TO GO TO THE HOSPITAL &I AM STILL HAVING TREATMENT ON MY NECK BACK &SHOULDER..NOT 1 OF THE AIR BAGS WENT OFF..IT WAS TOWED AWAY &THEN WAS TOTALED. ...I HAVE HIRED AN ATTORNEY. *TR
10915508	GMC	ENVOY	2007	2016-08-10	I HIT A GUARD RAIL AT 67 MPH...SPIKE WITH GMC AND SHE NOTIFY ME THAT MY THRESHOLD (SPEED AND IMPACT) WERE NOT ENOUGH TO SET AIRBAGS OFF..REALLY. .67 MPH..I WAS ON A HIGHWAY SWEATED TO MISS SEMI ..KICKED IT AND IT FLEW ME IN A CIRCLE AND HIT GAURDRAIL. .IMPACT HIT HARD THAT THEY HAD TO PRY BUMPER OFF RAIL AND CAR..FRAME WENT THROUGH RADIATOR BUT NO AIRBAGS DEPLOYED??? TRYING TO FIND LAWYER NO ONE WILL TAKE XASE????
10290508	GMC	YUKON	2007	2009-09-14	TRAVELING AT NIGHT, AT 65 MILES AN HOUR IN A 2007 YUKON SLE2 4 DR WAGON, I HIT A STEER (APPROXIMATELY 880LBS). UPON IMPACT, THE BOTTOM OF MY POWER DRIVER'S SEAT MOVED FORWARD AND THE BACK OF THE SEAT TILTED FORWARD, CAUSING ME TO HIT THE STEERING WHEEL. I HAD TO MOVE THE SEAT BACK TO GET OUT OF THE VEHICLE. THE AIRBAGS DID NOT DEPLOY. I REPORTED THE INCIDENT TO THE DEALER, AND MY INSURANCE AGENT BOTH VERBALLY AND IN WRITING. THE VEHICLE HAD OVER \$11,000.00 WORTH OF DAMAGE, BUT THE REPAIR CENTER STATED THEY WERE UNABLE TO FIND ANY DAMAGE TO THE SEAT. I TRADED THE VEHICLE IN, AS I DID NOT FEEL SAFE DRIVING IT WITH THE SEAT NOT BEING REPLACED OR REPAIRED. THE VEHICLE IS NOW FOR SALE AGAIN, AND I AM FEARFUL THAT SOMEONE ELSE WILL BE IN A WRECK AND THE SEAT WILL MALFUNCTION AGAIN. *TR
10701604	GMC	YUKON	2007	2015-03-06	TL* THE CONTACT OWNS A 2007 GMC YUKON. WHILE DRIVING APPROXIMATELY 60 MPH, THE CONTACT CRASHED INTO ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THERE WERE NO INJURIES AND A POLICE REPORT WAS FILED. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 180,000. THE VIN WAS NOT AVAILABLE.
11034703	GMC	YUKON	2007	2014-10-09	I HAVE TRIED TO SUBMIT MY YUKON FOR TANAKA RECALL REMEDY SEVERAL TIMES BY CONTACTING MY LOCAL GMC DEALERSHIP. THEIR SERVICE DEPT CONTINUES TO TELL ME THAT THEY DO NOT HAVE PARTS AVAILABLE TO MODIFY MY VEHICLE. A FEW YEARS AGO I BROADSIDED A LEXUS SUV WHICH 'RAN A TRAFFIC LIGHT'. MY AIRBAGS DID NOT DEPLOY, WHILE SEVERAL OF THE AIRBAGS DEPLOYED IN THE LEXUS. I FELT THAT MY LIFE MIGHT HAVE BEEN AT RISK SINCE THE AIRBAGS DID NOT DEPLOY, OR ALTERNATELY, AT EVEN WORST RISK IF THEY DID EXPLODE UPON DEPLOYMENT. WHO IS RESPONSIBLE FOR ADDRESSING THIS ISSUE? THE GMC DEALER SAYS THEY ARE NOT! I HAVE PHOTOS OF THE ACCIDENT AND A POLICE REPORT STATING THAT THE LADY WAS RESPONSIBLE FOR
10907149	CADILLAC	SRX	2006	2016-09-01	TL* THE CONTACT OWNED A 2006 CADILLAC SRX. WHILE DRIVING VARIOUS SPEEDS, THE VEHICLE HIT A CURB AND DROVE INTO A BUILDING. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO AN INDEPENDENT MECHANIC WHERE IT WAS DEEMED DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 77,814. UPDATED 10/26/16*LJ *TR

10223015	CHEVROLET	EQUINOX	2006	2008-02-28	FOUR CAR PILEUP ON HWY 41 NB. WE WERE VEH.#3 AND HIT FORWARD AND WERE HIT FROM BEHIND. OUR SEAT BELTS DID NOT RESTRAIN US AND THE AIR BAGS DID NOT DEPLOY. MY HUSBAND , ERNST, FLEW INTO THE DASHBOARD AND I SLAMMED INTO THE STEERING WHEEL. *TR
10241948	CHEVROLET	EQUINOX	2006	2008-09-10	THE VEHICLE WAS INVOLVED IN A FRONTAL CRASH. THE DRIVER NOR THE PASSENGER AIRBAG DEPLOYED. THE WHOLE FRONT END OF THE VEHICLE WAS PUSHED IN. *TR
10279951	CHEVROLET	EQUINOX	2006	2009-08-04	VEHICLE INVOLVED IN A ONE-AUTO ACCIDENT - 2006 CHEVROLET EQUINOX - HYDROPLANED AND HIT AN EMBANKMENT WITH THE FRONT END AND FLIPPED OVER. THE AIR BAG DID NOT DEPLOY. THIS IS NOT THE FIRST TIME THIS VEHICLE HAS HAD AN IMPACT TO THE FRONT BUMPER AND THE AIR BAG HAS NEVER DEPLOYED. EACH TIME THE FRONT BUMPER HAD DAMAGE SUSTAINED WHICH SHOULD HAVE CAUSED THE IMPACT THE SET THE AIR BAG OFF. *TR
10342436	CHEVROLET	EQUINOX	2006	2010-07-07	2006 CHEVY EQUINOX AIR BAGS DID NOT DEPLOY IN MY DAUGHTER'S FRONT CRASH ACCIDENT. HER CAR WAS TOTALED. SHE HIT A MAILBOX AND IN A SPIN ON THE DRIVER'S FRONT SIDE HIT A TELEPHONE POLE. SHE HIT HER HEAD ON THE STEERING WHEEL AND HURT HER BACK. THE REAR WINDSHIELD WAS ALSO SHATTERED AND ALSO HAD A BACK FLAT TIRE. I CALLED OUR LOCAL GM DEALER AND THEY TOLD ME TO CALL GM. SHE CALLED GM BUT THEY GOT HER UPSET AND SHE IN OTHER WORDS SAID THERE WAS NOTHING THEY COULD DO ABOUT THE AIR BAGS NOT DEPLOYING. IN OTHER WORDS THIS IS A DEFECT OF THIS MODEL AND THEY AREN'T GOING TO DO ANYTHING ABOUT IT. *TR
10503970	CHEVROLET	EQUINOX	2006	2013-03-19	I RAN OFF THE SIDE OF THE ROAD INTO A GUARDRAIL AND COULD NOT STOP UNTIL I WAS ON TOP OF THE GUARDRAIL INTO AN EMBANKMENT. MY ENTIRE FRONT END WAS DESTROYED AS WELL AS MOST OF THE UNDERNEATH OF THE CAR. MY FACE HIT THE STEERING WHEEL CAUSING ME TO LOSE CONSCIOUSNESS AS WELL AS GIVING ME A BLACK EYE, CROOKED TEETH, CUTS, BROKEN DENTAL APPLIANCES, AND MY TEETH WENT THROUGH MY LIP. I STRONGLY BELIEVE MY AIRBAGS SHOULD HAVE DEPLOYED AND PREVENTED THE IMPACT OF MY FACE TO THE STEERING WHEEL SINCE I THOUGHT THAT IS WHAT AIRBAGS ARE FOR. MY CAR WAS TOTALED. *TR
10560310	CHEVROLET	EQUINOX	2006	2013-11-14	HIT A ONE TON LOW BED DUMP TRUCK, THE WHOLE FRONT END OF MY SUV WAS DEMOLISHED, MY AIRBAGS DIDN'T DEPLOY AND I ENDED UP WITH REALLY BAD WHIPLASH FROM THE ACCIDENT, TO WHERE I'M STILL IN MAJOR PAIN! WONDERING IF THERE WAS A LAWSUIT AGAINST THIS? NEVER DEALT WITH A WRECK THIS BAD, I WAS JUST CURIOUS! *TR
10586081	CHEVROLET	EQUINOX	2006	2014-05-01	MY AIRBAG DID NOT DEPLOY WHEN THE CAR HIT THE TREE. IT HIT SO HARD THE BACK TIRES CAME COMPLETELY OFF THE GROUND. *TR
10939297	CHEVROLET	EQUINOX	2006	2016-12-30	MY GRANDDAUGHTER WAS INVOLVED IN AN ACCIDENT WHERE AS ANOTHER VEHICLE FAILED TO STOP AT A STOP SIGN AND PULLED INTO HER PATH. SHE AND THE OTHER VEHICLE WERE BOTH AT A SPEED OF 25 MPH. THE FRONT CLIP WAS TORN FROM HER CAR AND NO DRIVERS AIRBAG DEPLOYED. SHE DID HAVE HER SEATBELT ON WHICH DID PREVENT SERIOUS INJURY. THE ACCIDENT OCCURRED 30 DEC 2016. THIS HAPPENED ON CITY STREETS.
10343112	CHEVROLET	SILVERADO	2006	2010-03-22	TL* THE CONTACT OWNS A 2006 CHEVROLET SILVERADO. THE CONTACT STATED WHILE TRAVELING AT 40 MPH WHEN AN 18-WHEELER DROVE IN FRONT OF THE CONTACT SUDDENLY. THE CONTACT DID NOT HAVE ENOUGH TIME TO STOP THE VEHICLE BEFORE CRASHING INTO THE TRUCK. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED MINOR BRUISING. THE VEHICLE WAS TOWED TO A LOCAL REPAIR FACILITY WHERE THE CONTACT WAS AWAITING REPAIRS. THE POLICE ADVISED THAT THE AIR BAGS SHOULD HAVE DEPLOYED UPON IMPACT. THE FAILURE MILEAGE AND CURRENT MILEAGES WERE 88,508.
10411579	CHEVROLET	SILVERADO	2006	2010-07-28	MY 2006 SILVERADO 2500 HD AIR BAG DID NOT DEPLOY DURING MY ACCIDENT ON JULY 28, 2010. I TRIED SENDING ALL INFORMATION IN THE MAIL BUT, YOU JUST SENT IT BACK TO ME. COPING THAT WAS SENT TO ME FROM GENERAL MOTORS OF THEIR EXPLANATION OF THEY ARE NOT THE ONES RESPONSIBLE FOR THIS BECAUSE THEY DIDN'T MAKE THIS PRODUCT. NOT TO MENTION THAT ONSTAR DIDN'T COME ON AS THEY SHOW ON THEIR TV ADS'. IF I HAD NOT REGAIN CONSCIENCE. DON'T KNOW WHEN THEY WOULD HAVE FOUND ME THERE WHERE I WENT OFF THE ROAD JUST 4 MILES FROM MY HOME. DON'T KNOW IF ANYONE WOULD HAVE THOUGHT OF CALLING ONSTAR ABOUT LOOKING FOR MY TRUCK. IF GM VEHICLES ARE SO SAFE AND LEAD US TO BELIEVE HOW? SAFE AND RELIABLE THEIR VEHICLES ARE. THEN WHY? THEY ARE NOT STANDING BEHIND THEIR PARTS NOW. THE VEHICLE WAS TOTAL AND THE ONLY THING THAT SAVED ME WAS MY SEAT BELT. EVEN DOE I WAS STILL BADLY INJURED FROM MY NECK TO MY TAIL BONE. GM DOESN'T CARE TO OWN UP TO NO KIND OF RESPONSIBILITY FOR ANYTHING. I'M STILL AFRAID TO DRIVE MY 2010 CAMARO BECAUSE IT HAS THE SAME EQUIPMENT AS THE 2006 PICKUP THAT I TOTALED. I DRIVE IT WHENEVER I HAVE NO CHOICE. WHEN THE DODGE TRUCK ISN'T HERE. EVERY OTHER WEEK WHEN MY HUSBAND NEEDS IT. I'VE SENT YOU ALL THE PICTURES AND SOME OF THE LETTERS THAT GM'S [XXX] HAS SENT TO ME BUT, YOU DIDN'T EVEN OPEN IT ALL YOU DID WAS SEND IT BACK UNOPENED. WHAT'S UP WITH THIS???????????? MY NAME IS: [XXX] , MY ADDRESS IS:[XXX]; [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR

10775393	CHEVROLET	SILVERADO	2006	2010-03-22	TL* THE CONTACT OWNS A 2006 CHEVROLET SILVERADO. WHILE DRIVING AT 25 MPH, ANOTHER VEHICLE FAILED TO YIELD. AS A RESULT, THE CONTACT CRASHED INTO THE PASSENGER SIDE OF ANOTHER VEHICLE AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED HIP AND PELVIC INJURIES ON THE RIGHT SIDE THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 70,000.
10717429	CHEVROLET	TAHOE	2006	2015-05-09	DRIVER FELL ASLEEP RAN INTO THE BACK OF A SEMI TRUCK, AIRBAG DID NOT DEPLOY. VEHICLE WAS A TOTAL LOSS.
10217793	CHEVROLET	TRAILBLAZER	2006	2008-02-07	AROUND 11:45PM A 2006 CHEVY TRAILBLAZER TRAVELING OVER THE SPEED LIMIT ON MY STREET CRASHED INTO A TREE, A PARKED CAR, AND THEN CONTINUED TO ROLL OVER ACROSS MY FRONT LAWN, LANDING SIDEWAYS AFTER FLIPPING SEVERAL TIMES. THE OCCUPANTS WERE SEVERELY INJURED. NO AIRBAGS DEPLOYED DURING THE CRASH. THE DRIVER OF THE VEHICLE IS IN ICU NEEDING FACIAL RECONSTRUCTIVE SURGERY. *TR
10227418	CHEVROLET	TRAILBLAZER	2006	2008-05-09	WHILE DRIVING ON A DIRT ROAD THAT ONLY FITS ON CAR, I WAS INVOLVED IN A HEAD ON COLLISION INVOLVING A JEEP CHEROKEE. THERE WAS EXTENSIVE FRONT DAMAGE HOWEVER, THE AIRBAG DID NOT DEPLOY NOR DID ONSTAR CONTACT ME. I HAVE VERY PAINFUL NECK, HEAD, SHOULDER, AND RIGHT ARM PAIN. *TR
10244652	CHEVROLET	TRAILBLAZER	2006	2008-08-28	WE WERE INVOLVED IN A HEAD ON COLLISION WITH ANOTHER VEHICLE. BOTH WERE TRAVELING AT APPROXIMATELY 45 MPH. THE AIR BAGS DID NOT DEPLOY. I WAS DRIVING THE VEHICLE AND HAVE A BROKEN RIGHT LEG, BROKEN LEFT HEEL AND ANKLE. I WAS TEMPORARILY KNOCKED UNCONSCIOUS FROM HITTING THE STEERING WHEEL. MY WIFE SUFFERED A BROKEN WRIST, FRACTURED PELVIS, AND FRACTURED TIBULA. *TR
10364174	CHEVROLET	TRAILBLAZER	2006	2010-10-01	IN APPROXIMATELY APRIL OF 2010 MY GAS GAGE ON MY 06 TRAILBLAZER QUIT WORKING. THE PART WAS NO LONGER UNDER WARRANTY AT 84K MILES. VERY DANGEROUS WHEN TRAVELING 400 MILES WITH ELDERLY AUNT AND SMALL CHILD 2X A WEEK. ON OCTOBER 1, 2010 I WAS INVOLVED IN A HIGH SPEED COLLISION WHEN A CAR PULLED IN FRONT OF ME, WHILE I WAS GOING 70MPH. THE AIRBAGS DID NOT DEPLOY, I SUFFERED MAJOR TRAUMA TO MY KNEES AND AM UNABLE TO WALK WELL OR DRIVE. I HIT MY HEAD ON THE STEERING WHEEL AND CONTINUE TO HAVE PAIN. MY ELDERLY AUNT BROKE 3 CERVICAL VERTEBRAE AND STILL HAS A TRACHOTOMY OVER A MONTH LATER. SHE IS STILL IN THE HOSPITAL, AND IT IS UNKNOWN IF SHE WILL COME HOME. *TR
10389988	CHEVROLET	TRAILBLAZER	2006	2011-02-24	INERTIA REEL ON SEATBELT FAILED. NO AIR BAG DEPLOYMENT. 2006 TRAILBLAZER, FULL STRAIGHT HEAD ON CRASH. *TR
10524151	CHEVROLET	TRAILBLAZER	2006	2013-05-30	THIS COMPLAINT IS BEING FILED ON BEHALF OF THE VEHICLE OWNER AND DRIVER. THIS CHEVY TRAILBLAZER WAS INVOLVED IN A TWO VEHICLE, DOUBLE FATAL CRASH. THE FRONT OF THE TRAILBLAZER STRUCK THE DRIVER'S SIDE DOOR OF A CAVALIER THAT FAILED TO YIELD FROM A STOP SIGN. THE TRAILBLAZER STAYED CONNECTED WITH THE CAVALIER, FORCING IT OFF THE LEFT SIDE OF THE ROADWAY AND INTO A LARGE TREE. BOTH OCCUPANTS IN THE CAVALIER WERE FATALLY INJURED. THE FRONT AIRBAGS DID NOT DEPLOY ON THE TRAILBLAZER AND NO EVENT WAS RECORDED ON THE AIRBAG CONTROL MODULE. *TR
10548331	CHEVROLET	TRAILBLAZER	2006	2013-10-10	I WAS DRIVING DOWN THE HIGHWAY AND HAD GOT CUT OFF BY A CAR. I SWERVED AND AVOIDED HITTING THE CAR BUT ENDED UP HITTING THE MEDIAN ALMOST DIRECTLY HEAD ON. THE WHOLE FRONT OF THE VEHICLE WAS SMASHED IN AND THE VEHICLE WAS TOTALED. THE AIRBAGS NEVER WENT OFF, ME AND MY PASSENGER WERE BOTH WEARING OUR SEAT BELT AND I ENDED UP HITTING MY HEAD ON THE STEERING WHEEL LEAVING ME UNCONSCIOUS. AN AMBULANCE RUSHED ME TO THE HOSPITAL AND I RECEIVED 10 STITCHES ABOVE MY LEFT EYE. *TR
10550276	CHEVROLET	TRAILBLAZER	2006	2013-10-28	TL* THE CONTACT OWNS A 2006 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 35 MPH, SHE LOST CONTROL OF THE VEHICLE WHILE DRIVING IN SNOWY WEATHER. THE VEHICLE NOSE DIVED INTO AN EMBANKMENT AND THEN CRASHED INTO A BOULDER. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT WAS TRANSPORTED TO THE HOSPITAL VIA AMBULANCE FOR TREATMENT OF A CONCUSSION AND BRUISING. THE FRONT PASSENGER WAS ALSO INJURED AND SUSTAINED BRUISING. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 102,000.
10679561	CHEVROLET	TRAILBLAZER	2006	2014-10-06	TL* THE CONTACT OWNED A 2006 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING AT 35 MPH, THE DRIVER DRIFTED OFF THE ROAD AND CRASHED THE VEHICLE INTO A TREE. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED A FRACTURED NOSE AND LEFT CHEEKBONE THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED AND TOWED BACK TO THE CONTACTS RESIDENCE. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 199,000.
10888990	CHEVROLET	TRAILBLAZER	2006	2016-07-21	VEHICLE WAS TRAVELING ON CITY STREET AT 30MPH WHEN IT STRUCK A UTILITY POLE, SHEARING IT OFF AT THE BASE. VEHICLE THEN TRAVELED STRAIGHT UP A HILL AND STRUCK A HOUSE, COMING TO REST THERE. NONE OF THE AIR BAGS DEPLOYED. NEWS STORY AT HTTP://WWW.WGEM.COM/CATEGORY/133158/VIDEO-LANDING-PAGE?&CLIPID=12610200&AUTOSTART=TRUE

10955948	CHEVROLET	TRAILBLAZER	2006	2016-09-08	LETTER FROM SENATOR NELSON ON BEHALF OF CONSTITUENT REGARDING GENERAL MOTOR SAFETY DEFECTS. *LD THE CONSUMER SUGGESTED THERE WAS A DEFECT WITH THE GM AIR BAGS IN 2006 CHEVROLET TRAILBLAZER, IN WHICH THE DRIVER SUSTAINED A BRAIN INJURY AND HIS WIFE WAS INJURED, WHEN IT WAS IMPACTED ON THE DRIVER'S SIDE, RESULTING IN LEFT A-PILLAR CONTACT WHEN THE AIR BAG FAILED TO DEPLOY AND HIS SEAT BELT RESTRAINTS FAILED. THE CRASH WAS OF ENORMOUS SEVERITY, WITH A SPEED CHANGE OF 38 MPH WITH A LINE FORCE IN THE DIRECTION OF THE A PILLAR. *JB
10966507	CHEVROLET	TRAILBLAZER	2006	2017-02-27	I WAS IN A CRASH AND NEITHER FRONT AIRBAG DEPLOYED, MY INSURANCE ADJUSTER QUESTIONED IF THE AIR BAG SYSTEM EVEN WORKS. I HAVE COPY OF THE ESTIMATE TO REPAIR AS WELL. DUE TO THE FORCE OF IMPACT EVEN LOCAL REPAIR SHOP STATED THAT MY AIR BAGS SHOULD HAVE GONE OFF AS WELL. IS THERE A RECALL ON THIS MODEL FOR AIR BAGS NOT DEPLOYING? I WAS IN A SECOND WRECK ON 3/7/17 AND NEITHER AIR BAG DEPLOYED AT THAT TIME EITHER AND THERE WAS NO BUMPER SO AIR BAGS SHOULD HAVE DEFINITELY GONE OFF.
10403445	GMC	ENVOY	2006	2011-05-20	I HAD A CRASH AT 45 MPH INTO A LARGE TREE \$9000+ DAMAGE TO THE FRONT END OF MY CAR AND THE AIRBAG NEVER WENT OFF. ONSTAR WAS CALLED AND HELPED ME.
10704170	GMC	ENVOY	2006	2015-03-22	I WAS INVOLVED IN A HEAD ON COLLISION, WHERE A CAR CAME AROUND A BUS INTO MY LANE . IT WAS A CLEAR CUT CASE OF WHO WAS AT FAULT. MY CONCERN IS THAT MY AIR BAG NEVER DEPLOYED. THERE IS A DRIVER AND PASSENGER AIRBAG IN THAT MODEL. IF NOT FOR MY SEAT BELT , I WOULD HAVE GONE THROUGH THE WINDSHIELD AND THE VEHICLE WAS TOTALED FROM THE FORCE. THERE ARE PICTURES I COULD FORWARD OF THE ACCIDENT. I WANTED TO KNOW IF THERE WAS ANY THING ELSE I COULD DO TO ADDRESS THIS ISSUE. THANK YOU *TR
10780171	GMC	YUKON	2006	2015-08-21	MY FATHER WAS DRIVING FROM DIALYSIS ON THE DECLINE OF A BRIDGE WHEN HE PASSED OUT BEHIND THE WHEEL. HE WAS WEARING HIS SEATBELT, AND THE VEHICLE RESTED AFTER HITING A TREE. THE AIRBAGS DID NOT DEPLOY. I HAVE CONTACTED GMC AND THERE IS AN INVESTIGATION PENDING, THEY HAVE SENT A REPRESENTAIVE TO INSPECT THE VEHICLE AND I AM AWAITING THE OUTCOME. I HAVE CONTACTED COPART AND HAD THE VEHICLE PLACED ON HOLD TO ALLOW NHTSA THE OPPORTUNITY TO DO THE SAME, IF YOU CHOOSE. 5017 DUNCAN ROAD, PUNTA GORDA, FL (941) 505-9700. PLEASE FEEL FREE TO CONTACT ME WITH ANY QUESTIONS.
11377560	GMC	YUKON	2006	2011-06-07	AIRBAG FAILED FUNCTION DUE TO LACK OF INFLATOR PERFORMANCE DURING MY HUSBANDS HEAD-ON CRASH AND HE SUFFERED COLLAR BONE AND RIB FRACTURES,MASSIVE HEAD TRAUMA RESULTING IN A CRAINIOTOMY,BRAIN DAMAGE AND DEATH ONE MONTH LATER. THE VEHICLE WAS TRAVELLING AT 45MPH ON A PAVED TWO LANE STREET.
10275950	BUICK	RAINIER	2005	2009-06-30	2005 BUICK RAINIER WAS IN A HEAD ON COLLISION WITH A CHRYSLER TOWN & COUNTRY VAN IN COMING TRAFFIC. MY WIFE DRIVING THE RAINIER HIT HER HEAD ON THE STEERING WHEEL AND BENT IT. SHE RECEIVE A LARGE LACERATION REQUIRING ABOUT 30 STITCHES, CLAVICLE STRAIN, BROKEN COLLAR BONE AND MULTIPLE BRUISES. SHE WAS WEARING THE SEAT BELT. COLLISION WAS STRONG ENOUGH TO LIFT THE REAR OF THE CAR OFF THE GROUND AND TURN IT FACING THE SAME DIRECTION AS THE VAN SHE HIT. THE AIRBAGS DID NOT DEPLOY! *TR
10152376	CADILLAC	ESCALADE	2005	2006-03-01	HAD A FRONT END COLLISION WITH ANOTHER VEHICLE AND NONE OF MY AIRBAGS DEPLOYED. THE VEHICLE WAS 4 WEEKS OLD AND HAD 1850 MILES AT THE TIME OF THE ACCIDENT. CALLED CADILLAC CUSTOMER SERVICE AND WAS GIVEN AN AIRBAG HISTORY LESSON VIA TELEPHONE FROM SOMEONE THAT HAD NEVER SEEN MY VEHICLE OR INSPECTED IT FOR DAMAGE AFTER THE ACCIDENT. AT THE END OF OUR CONVERSATION I WAS TOLD ALL WAS OK, NONE OF MY AIRBAGS SHOULD HAVE DEPLOYED AND NOT TO WORRY ABOUT IT. THE ENTIRE FRONT END OF MY VEHICLE WAS KNOCKED OFF, THE FRAME HAS MULTIPLE CRACKS AND IS BENT AS A RESULT OF THE COLLISION AND THE COLLISION CENTER IS 90% CERTAIN THE VEHICLE IS NOT REPAIRABLE. *JB
10895442	CADILLAC	SRX	2005	2016-08-11	AIRBAG DIDN'T DEPLOY IN AN ACCIDENT ON AUGUST 11 2016. AIRBAG IS FAULTY AND CONCERN ABOUT THE SAFETY OF THE 2005 SRC
10968319	CADILLAC	SRX	2005	2017-03-14	TL* THE CONTACT'S DAUGHTER OWNED A 2005 CADILLAC SRX. WHILE DRIVING APPROXIMATELY 40 MPH ON AN ICY, SNOWY ROAD, THE VEHICLE STARTED TO SKID AND THE DRIVER LOST CONTROL OF THE VEHICLE. THE DRIVER CRASHED INTO A CEMENT WALL. ALL THE AIR BAGS FAILED TO DEPLOY. THE DRIVER SUSTAINED HEAD INJURIES THAT REQUIRED MEDICAL ATTENTION ALONG WITH BRUISES TO THE CHEST, RIGHT ARM, AND LEG. A POLICE REPORT WAS FAILED. THE VEHICLE WAS TOWED AND DEEMED DESTROYED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 110,000. THE VIN WAS UNAVAILABLE.
10120423	CHEVROLET	EQUINOX	2005	2005-05-01	2005 CHEVROLET EQUINOX REAR ENDED ANOTHER VEHICLE AFTER BEING HIT IN THE REAR WHILE STOPPED. THE AIR BAGS DID NOT DEPLOY AND THE SEAT BELTS DID NOT ENGAGE.*MR THE DRIVER SUSTAINED SOME INJURIES WHEN HE WAS PUSHED FORWARD INTO THE STEERING WHEEL AND DASH. *NM
10221708	CHEVROLET	EQUINOX	2005	1901-01-01	2005 CHEVY EQUINOX AIR BAGS DID NOT DEPLOY. CONSUMER STATES THAT HE WAS INVOLVED IN A FRONTAL CRASH AND AIR BAGS FAILED TO DEPLOY. HE STATES THAT THE CRASH SPEED WAS ABOUT 35 MPH. *KB

10221964	CHEVROLET	EQUINOX	2005	2007-12-15	I HAD A HEAD ON COLLISION WITH A CONCRETE WALL IN MY 2005 CHEVROLET EQUINOX ON DECEMBER 15, 2007. I WAS TRAVELING ABOUT 55-60 MPH WHEN THE HEAD ON COLLISION OCCURRED. MY AIRBAGS DID NOT DEPLOY. HOWEVER THE TALC POWER AND THE SMELL CAME OUT. I HAD AN INVESTIGATION DONE ON THE AIRBAGS. I WAS TOLD BY A GM INVESTIGATION REP THAT THE VEHICLE HAS TO SLOW DOWN 10-15 MPH FOR THE AIRBAGS TO DEPLOY. THE INVESTIGATION SHOWED THAT THE VEHICLE SLOWED DOWN 11.85 MPH WHICH FALLS WITHIN THE RANGE FOR THE AIRBAGS TO DEPLOY. I NEED A SECOND OPINION BECAUSE GM STATED THAT DESPITE WHAT THE REPORT SAYS, THEY ARE NOT AT FAULT FOR THE AIRBAGS. *TR
10266217	CHEVROLET	EQUINOX	2005	2009-04-14	TL*THE CONTACT OWNS A 2005 CHEVROLET EQUINOX. WHILE DRIVING 40 MPH, ANOTHER DRIVER PULLED OUT IN FRONT OF THE CONTACT'S VEHICLE. AS A RESULT, THE CONTACT CRASHED INTO THE OTHER VEHICLE. THE FRONT DRIVER'S SIDE AIR BAG FAILED TO DEPLOY AND THE CONTACT SUSTAINED MINOR NECK INJURIES. A POLICE REPORT WAS FILED. THE VEHICLE WAS INSPECTED BY HER INSURANCE AGENCY AND THEY STATED THAT IT WAS DESTROYED. THE ADJUSTER WAS UNABLE TO DETERMINE WHY THE AIR BAGS DID NOT DEPLOY. THE CONTACT CALLED THE MANUFACTURER AND WAS INFORMED THAT SHE WOULD RECEIVE A CALL BACK REGARDING THE CRASH. THE FAILURE MILEAGE WAS 30,000.
10440022	CHEVROLET	EQUINOX	2005	2011-12-13	TL* THE CONTACT OWNS A 2005 CHEVROLET EQUINOX. THE CONTACT WAS DRIVING 30 MPH WHEN A DEER JUMPED A FENCE AND LANDED ON THE HOOD OF THE VEHICLE WITH EXTREME FORCE. THE CONTACT STATED THE ENGINE CONTINUED TO RUN BUT THE INTERIOR AND EXTERIOR LIGHTNING FAILED. THE AIR BAGS ALSO FAILED TO DEPLOY. THE POLICE WERE NOT CONTACTED AND THERE WERE NO INJURIES. THE VEHICLE WAS TAKEN TO A LOCAL REPAIR SHOP AND THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS NOT REPAIRED. THE VIN WAS UNAVAILABLE. THE FAILURE AND THE CURRENT MILEAGES WERE 73,000. UPDATED 01/10/12*LJ
10489315	CHEVROLET	EQUINOX	2005	2012-12-15	I WAS DRIVING, HIT ICE, FISH TAILED, STARTED TO SPIN, WENT HEAD FIRST INTO THE MEDIAN, PROBABLY GOING 30-45 MPH. AFTER THAT WE CAME TO A STOP, AND WERE HIT BY A SEMI TRAILER TRAVELING AT APPROXIMATELY 45-60 MPH. NEITHER IMPACT SET THE AIR BAGS OFF AND WE BELIEVE THAT IT SHOULD HAVE. *TR
10597676	CHEVROLET	EQUINOX	2005	2004-10-31	TL* THE CONTACT OWNS A 2005 CHEVROLET EQUINOX. WHILE DRIVING APPROXIMATELY 70 MPH ON THE HIGHWAY, THE CONTACT NOTICED THE KEY WAS DETACHING FROM THE IGNITION. THE DEALER STATED THAT THE VIN WAS NOT INCLUDED IN NHTSA CAMPAIGN NUMBER: 04V302000 (POWER TRAIN). WHILE DRIVING 35 MPH, THE CONTACT WAS INVOLVED IN A CRASH AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT WAS INJURED AND RECEIVED MEDICAL ATTENTION. THE VEHICLE WAS REPAIRED BY THE DEALER. THE MANUFACTURER WAS NOT NOTIFIED. THE APPROXIMATE FAILURE MILEAGE WAS 70.
10597688	CHEVROLET	EQUINOX	2005	2005-10-31	DRIVING DOWN STREET CUT OFF BY SEMI RAN INTO FLASHING SIGN WITH NOWHERE ELSE TO GO. OVER HALF PASSENGER FRONT BUMPER WAS CRUSHED RADIATOR SMASHED, WHOLE FRONT PASSENGER QUARTER SMASHED. CAR WAS UNDRIVEABLE BUT AIR BAGS DID NOT GO OFF. *TR
10716175	CHEVROLET	EQUINOX	2005	2013-12-13	HEAD ON ACCIDENT INTO DITCH, AIRBAGS DID NOT GO OFF
10936302	CHEVROLET	EQUINOX	2005	2016-12-15	I WAS IN AN ACCIDENT ON 12/15/2016 WHERE I HIT SOMEONE FROM BEHIND. I WAS DRIVING STRAIGHT DOWN THE HIGHWAY AND DIDN'T NOTICE THE PEOPLE IN FRONT OF ME STOPPING. WHEN I HIT THE BRAKES, IT WAS TOO LATE AND MY CHEST WENT FLYING AGAINST THE STEERING WHEEL. WHEN MY EQUINOX HIT THEM, MY SEAT BELT DID NOT LOCK AND MY CHEST HIT THE STEERING WHEEL. I HAD TO GO TO THE HOSPITAL BECAUSE OF THE FORCE OF THE IMPACT. THE FORCE WAS SO HARD THAT THE AIR BAG DID NOT COME OUT. I DON'T KNOW IF THERE IS AN AIR BAG INSIDE THE VEHICLE. I COULD NOT CATCH MY BREATH AND I TESTED OUT MY SEAT BELT AND REALIZED IT DOES NOT LOCK WHEN BREAKING. IT IS ACTUALLY LOSE THE WHOLE TIME I AM DRIVING. THIS IS NOT SAFE FOR ME OR A PASSAGE THAT I HAVE IN THE CAR. TESTED OUT THE PASSAGE SIDE AS WELL AND IT IS THE SAME THING. *TR
11023592	CHEVROLET	EQUINOX	2005	2017-09-06	TL* THE CONTACT OWNS A 2005 CHEVROLET EQUINOX. WHILE DRIVING 45 MPH, THE CONTACT CRASHED INTO ANOTHER VEHICLE. ALL THE AIR BAGS FAILED TO DEPLOY. THE CONTACT NOTICED SMOKE COMING FROM THE RADIATOR. THE VEHICLE WAS TOWED TO XTREME COLOR INC. IN KANSAS CITY, KS 66102; 913-281-0830. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED A NECK AND BACK INJURY THAT REQUIRED MEDICAL ATTENTION. THE MANUFACTURER WAS NOT CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 146,500.
11127938	CHEVROLET	EQUINOX	2005	2018-07-20	TL* THE CONTACT OWNS A 2005 CHEVROLET EQUINOX. WHILE DRIVING 24 MPH ON AN EXIT RAMP, THE VEHICLE INADVERTENTLY DROVE OFF THE SIDE OF THE RAMP AND CRASHED. THE AIR BAGS FAILED TO DEPLOY AND THE SEAT BELT FAILED TO RESTRAIN THE CONTACT. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE CONTACT SUSTAINED MINOR INJURIES TO THE HEAD AND HIPS THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A TOW LOT. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND A FIELD INSPECTOR WAS SENT TO INSPECT THE VEHICLE. THE CONTACT WAS AWAITING THE INSPECTION RESULTS. THE VEHICLE WAS NOT TAKEN TO A DEALER FOR DIAGNOSTIC TESTING. THE FAILURE MILEAGE WAS 140,000.

11191960	CHEVROLET	EQUINOX	2005	2019-03-27	TL* THE CONTACT OWNS A 2005 CHEVROLET EQUINOX. WHILE DRIVING 35 MPH AND DRIVING STRAIGHT PREPARING TO MAKE A RIGHT TURN, THE CONTACT CRASHED INTO THE FRONT QUARTER PANEL OF ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED INJURIES TO THE HEAD AND ANKLE, WHICH REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO AN INDEPENDENT LOT. THE DEALER AND MANUFACTURER WERE NOT CONTACTED. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE FAILURE MILEAGE WAS 65,000. *DT *TR
11297402	CHEVROLET	EQUINOX	2005	2020-01-05	TL* THE CONTACT OWNED A 2005 CHEVROLET EQUINOX. THE CONTACT STATED THAT WHILE DRIVING 55 MPH AND TURNING ON CURVE TOO FAST, CONTROL OF THE VEHICLE WAS LOST. THE VEHICLE SWERVED LEFT AND RIGHT ULTIMATELY COMING TO A STOP AFTER CRASHING INTO A TREE. THE AIR BAGS FAILED TO DEPLOY. DURING THE IMPACT THE CONTACT HEAD WAS HIT ON THE WINDSHIELD AND ABRASION TO THE KNEE WERE SUSTAINED. MEDICAL ATTENTION WAS NOT SOUGHT. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A TOW YARD. THE VEHICLE WAS DESTROYED. THE DEALER AND MANUFACTURER WERE NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 165,000.
10117624	CHEVROLET	SILVERADO	2005	2005-03-29	WHILE DRIVING 40 MPH VEHICLE CRASHED INTO A STORE FRONT. UPON IMPACT, DUAL AIRBAGS DID NOT DEPLOY. NO INJURIES REPORTED. *AK
10137371	CHEVROLET	SILVERADO	2005	2005-09-20	I HAD AN ACCIDENT ON TUESDAY SEPT. 20, 2005 DRIVING MY 2005 CHEVY PICKUP K2500 HD 4 WHEEL DRIVE. I LOST CONTROL AND WENT OFF HIGHWAY STRIKING A CITY DUMPSTER HEADON AND MOVING THE DUMPSTER APPROXIMATELY 50-60 FT. BY POLICE REPORT AND THEN GOING BACK ON HIGHWAY AND CROSSING ALL 4 LANES BEFORE THE TRUCK STOPPED. MY TRUCK WAS TOTALED BUT MY AIRBAG NEVER DEPLOYED. I WAS UNCONSCIOUS AND WAS AIRLIFTED TO VANDERBILT HOSPITAL IN NASHVILLE TN. WHY DIDN'T MY AIRBAG DEPLOY WITH A HEADON CRASH OF THIS FORCE? THIS SEEMS TO BE A DEFECT IN THE PRODUCT. I RECEIVED A 4 INCH CUT ACROSS THE BOTTOM OF MY CHIN THAT REQUIRED SEVERAL STITCHES AND VERY SORE FROM MY HEAD DOWN MY RIGHT LEG. STILL FOLLOWING UP WITH DOCTORS.... *NM
10153906	CHEVROLET	SILVERADO	2005	2006-03-27	DT*: THE CONTACT STATED THE VEHICLE WAS INVOLVED IN AN ACCIDENT ON DRY ROADS. TWO VEHICLES COLLIDED IN FRONT OF THE CONTACT, CAUSING AN EMERGENCY BRAKING SITUATION. THE CONTACT COLLIDED WITH THE REAR OF THE SECOND VEHICLE, AND THE AIR BAGS DID NOT DEPLOY. THE CONTACT WAS INJURED IN THE ACCIDENT. AN INDEPENDENT REPAIR SHOP WAS CONSULTED AND THEY WERE UNABLE TO DUPLICATE THE PROBLEM.
10201747	CHEVROLET	SILVERADO	2005	2007-08-27	AIRBAG FAILURE IN HEAD-ON COLLISION, TOTALING 2 TRUCKS. *JB
10455110	CHEVROLET	SUBURBAN	2005	2011-12-06	TL* THE CONTACT OWNS A 2005 CHEVROLET SUBURBAN. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 30 MPH, SHE CRASHED INTO THE REAR OF A TRASH TRUCK. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THE DRIVER SUSTAINED INJURIES TO THE LEFT ARM AND LEFT LEG. THE POLICE WERE CONTACTED AND A REPORT WAS FILED. THE VEHICLE WAS TOWED TO AN INDEPENDENT MECHANIC WHERE THEY DEEMED THE VEHICLE AS BEING DESTROYED. THE MANUFACTURER WAS CONTACTED AND AFTER DIAGNOSING THE VEHICLE, THEY ADVISED HER THAT THE VEHICLE WAS NOT TRAVELING FAST ENOUGH AT THE TIME OF IMPACT FOR THE AIRBAGS TO DEPLOY. THE FAILURE MILEAGE WAS APPROXIMATELY 80,000.
10130316	CHEVROLET	TAHOE	2005	2005-07-16	DT: ON JULY 16, 2005 WHILE TRAVELING AT 55 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A HEAD ON COLLISION WITH ANOTHER VEHICLE. TOTALED THE OTHER VEHICLE. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. VEHICLE HAS NOT BEEN INSPECTED TO SEE WHY THE AIR BAGS DID NOT DEPLOY. AIR BAG LIGHT CAME ON. CONSUMER CALLED THE DEALERSHIP, AND THEY ADVISED CONSUMER NOT DRIVE THE VEHICLE TO THE DEALERSHIP BECAUSE THE AIRBAGS MIGHT DEPLOY. THE VEHICLE WAS TAKEN TO THE BODY SHOP YESTERDAY TO BE FIXED. THE CONSUMER SPRAINED BACK AND NECK. A POLICE REPORT WAS ISSUED.*AK
10200191	CHEVROLET	TAHOE	2005	2007-06-18	AIR BAGS FAILED TO DEPLOY IN A CRASH. THE FRAME OF OUR 2005 CHEVROLET TAHOE WAS BUCKLED IN THE CRASH. CRASH TEST DATA WAS RETRIEVED FROM THE VEHICLE, ALTHOUGH GENERAL MOTORS DOES NOT FEEL THAT THEY ARE IN A POSITION TO HONOR OUR REQUEST FOR DAMAGES AGAINST THEM. MY HUSBAND AND I BOTH RECEIVED BACK AND NECK INJURIES DURING THE ACCIDENT. *TR
10335468	CHEVROLET	TAHOE	2005	2009-06-12	TL*THE CONTACT OWNS A 2005 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING AT APPROXIMATELY 55 MPH, THE VEHICLE CRASHED INTO A DEER BUT THE AIR BAGS DID NOT DEPLOY. THERE WAS EXTENSIVE DAMAGE TO THE VEHICLE. A POLICE REPORT WAS FILED. THE DEALER STATED THAT THE VEHICLE COULD BE INSPECTED AT THE CONTACT'S EXPENSE. THE BODY DAMAGE HAD BEEN REPAIRED. THE FAILURE MILEAGE WAS APPROXIMATELY 75,000. THE CURRENT MILEAGE WAS APPROXIMATELY 100,000.
10494771	CHEVROLET	TAHOE	2005	2013-01-24	2005 CHEVY TAHOE WAS IN AN ACCIDENT AND HIT FRONT DRIVERS SIDE INTO DIRT EMBANKMENT AT 35-40 MPH PUSH DRIVERS SIDE TIRE BACK ABOUT 3" AND BUCKLED HOOD AND FENDER AND THE AIRBAGS DIDN'T GO OFF. *TR

10748242	CHEVROLET	TAHOE	2005	2015-08-11	TL* THE CONTACT OWNED A 2005 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 50 MPH, THE REAR DRIVER SIDE WHEEL BECAME DETACHED FROM THE VEHICLE AND CAUSED THE CONTACT TO LOSE CONTROL OF THE VEHICLE. THE CONTACT CRASHED INTO A WOODEN POLE, WHICH CRASHED THROUGH THE FRONT WINDOW. THE VEHICLE FLIPPED OVER THREE TIMES AND LANDED UPSIDE DOWN. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED BROKEN BONES AND INJURIES THAT REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS TOWED TO THE TOWING COMPANY. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 131,000.
10134099	CHEVROLET	TRAILBLAZER	2005	2005-05-12	I WAS INVOLVE IN AN ACCIDENT WHERE I HAVE LOST CONTROL OF A CHEVROLET TRAILBLAZER AND HIT A CENTER DIVIDER ON THE FREEWAY. WITH THE FRONT BUMPER SMASHED ONTO THE CENTER DIVIDER, THE AIR BAG FAILED TO DELPLOY.
10141221	CHEVROLET	TRAILBLAZER	2005	2005-10-19	CHEVY TRAILBLAZER ('05 OR '06) REAR ENDED ANOTHER VEHICLE AT A SPEED FAST ENOUGH TO TOTAL THE TRAILBLAZER. THE AIRBAG DID NOT DEPLOY AND THE DRIVER SUSTAINED CHEST AND HEART INJURIES. *NM
10143976	CHEVROLET	TRAILBLAZER	2005	2005-11-20	DT: THE CONTACT'S BOY FRIEND WAS TRAVELING AT 78 MPH WHEN HE LOST CONTROL OF THE VEHICLE, AND IT WAS INVOLVED IN A FRONTAL IMPACT. THE VEHICLE ROLLED OVER SIX TIMES. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THE CONTACT AND PASSENGER SUSTAINED INJURIES. MANUFACTURER WAS NOT CONTACTED. *AK
10161963	CHEVROLET	TRAILBLAZER	2005	2006-07-08	7/8/06, WHILE TRAVELING HIGHWAY 31 IN NILES, MICHIGAN, SPEED LIMIT OF 70 MPH, WE HIT A DEER HEAD ON WITH OUR 2005 CHEVY TRAILBLAZER LS, S/N. WE HAD NO TIME TO EVEN BRAKE PRIOR TO THE IMPACT. THE IMPACT TOOK OUT THE FRONT END OF THE CAR, PUSHING THE RADIATOR BACK INTO THE ENGINE COMPARTMENT. NEITHER AIR BAG DEPLOYED. THERE WERE 4 PASSENGERS IN THE VEHICLE, INCLUDING AN 11-YEAR OLD BOY, AND A 14-YEAR OLD BOY. *JB
10173065	CHEVROLET	TRAILBLAZER	2005	2006-11-08	DT*: THE CONTACT STATED WHILE DRIVING 40 MPH ENTERING THE FREEWAY, THE VEHICLE REAR ENDED ANOTHER VEHICLE AND NONE OF THE AIR BAGS DEPLOYED. THE AIRBAG WARNING LIGHT DID NOT ILLUMINATE PRIOR TO THE CRASH. A POLICE REPORT WAS FILED IN THE STATE OF CALIFORNIA. THERE WERE TWO PEOPLE INJURED; THE NOSE OF THE CHILD WAS BLEEDING AND THE CONTACT SUFFERED A NECK INJURY. THE CHILD WAS 6 YEARS OLD AND THE CONTACT WAS 22 YEARS OLD. BOTH OF THE PASSENGERS WERE WEARING SEAT BELT. THE WEATHER WAS CLOUDY. A POLICE REPORT WAS PROCESS. THE SERVICE DEALER AND THE MANUFACTURER WERE NOT NOTIFIED.
10178482	CHEVROLET	TRAILBLAZER	2005	2007-01-08	TL* - THE CONTACT'S 2005 CHEVY TRAILBLAZER WAS PURCHASED USED ON AUGUST 13, 2005 FROM BERGLUND CHEVROLET OF VIRGINIA, WITH 13000 MILES. THE VEHICLE WAS INVOLVED IN AN ACCIDENT ON JANUARY 8TH, 2007 WHERE THERE WAS ONE FATALITY AND FIVE PEOPLE WERE INJURED. A SECOND VEHICLE, A BUICK LASABRE, FAILED TO STOP AT STOP SIGN WHILE MAKING A LEFT HAND TURN. THE CONTACTS VEHICLE STRUCK THE SECOND VEHICLE DIRECTLY ON THE DRIVERS SIDE. THE CONTACTS VEHICLE WAS TRAVELING AT 50 MPH. THE DRIVER OF THE SECOND VEHICLE WAS PRONOUNCED DEAD AT THE SCENE. THE CONTACTS VEHICLE PASSENGER AND DRIVER SIDE AIR BAGS NEVER DEPLOYED, EVEN THOUGH THERE WERE PASSENGERS IN ALL SEATS. SIX STATE TROOPERS WERE ON THE SCENE AND NO ONE WAS SITED.
10205154	CHEVROLET	TRAILBLAZER	2005	2007-10-06	I WAS DRIVING ON AN ELEVATED INTERSTATE AND LOST CONTROL OF THE VEHICLE. I HIT THE GUARDRAIL IN A DIRECT FRONTAL IMPACT. THE ENTIRE FRONT OF THE CAR WAS CRUSHED ABOUT 40 INCHES. THE CAR IS TOTALED BUT THE AIRBAGS DID NOT DEPLOY. I SUFFERED SOME INJURIES ON MY HEAD EVEN THOUGH I HAD MY SEATBELT ON. *JB
10221319	CHEVROLET	TRAILBLAZER	2005	2008-02-21	I WAS DRIVING ON A 2 LANE ROAD GOING 45MPH. A CAR WAS FOLLOWING CLOSE BEHIND ME SO I WENT TO GET INTO RIGHT LANE AND MY TRUCK DID 5 360 AND HIT 3 TREES HEAD ON AND AIR BAG NEVER DEPLOYED. *TR
10239994	CHEVROLET	TRAILBLAZER	2005	2008-08-25	TL*THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. WHILE DRIVING 60 MPH, THE CONTACT STRUCK THE GUARDRAIL. THE VEHICLE WAS DESTROYED AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT HAS PICTURES OF THE VEHICLE. SHE WAS TRANSPORTED TO THE HOSPITAL AND IS CURRENTLY IN PAIN. A POLICE REPORT WAS FILED. THE AIR BAGS WERE NOT SERVICED PRIOR TO THE CRASH. THE VIN WAS UNKNOWN. THE FAILURE MILEAGE WAS 44,000.
10241433	CHEVROLET	TRAILBLAZER	2005	2005-09-07	TL*THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 45 MPH, THE CONTACT CRASHED INTO ANOTHER VEHICLE, WHICH RESULTED IN A THREE CAR PILE UP. THE FRONT END OF HER VEHICLE WENT UNDERNEATH THE PRECEDING VEHICLE. THE AIR BAGS FAILED TO DEPLOY. SHE WAS UNABLE TO RECEIVE ASSISTANCE FROM ON STAR DUE TO THE AIR BAG FAILURE. THERE WERE NO PRIOR FAILURES WITH HER VEHICLE. THE CONTACT AND THREE CHILDREN IN SAFETY SEATS SUSTAINED MINOR INJURIES. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE 76,000.

10254382	CHEVROLET	TRAILBLAZER	2005	2008-12-16	MY DAUGHTER HAD AN ACCIDENT ON 12/16/2008. SHE HAS(HAD) A 2005 CHEVROLET TRAILBLAZER LS, 2 WHEEL DRIVE SUV. WHILE DRIVING ON THE OHIO TURNPIKE DURING A SNOW STORM SHE LOST CONTROL AND HAD A HEAD ON CRASH WITH A CEMENT RETAINING WALL WHILE TRAVELING BETWEEN 25 TO 35 MILES PER HOUR. THE AIR BAG DID NOT DEPLOY DURING THE ACCIDENT AND SHE SLAMMED HARD INTO THE STEERING WHEEL RESULTING IN A CONCUSSION, CHEST INJURIES, SORE WRIST, DIZZINESS, AND STILL HAS RINGING IN ONE EAR. SHE DID HAVE HER SAFETY BELT ON AT THE TIME OF THE ACCIDENT AND ALWAYS WEARS IT. WE ARE BAFLED AS TO WHY THE AIR BAG DID NOT COME OUT AS IT WOULD HAVE SAVE HER MUCH PAIN. THE CAR IS A TOTAL WRECK AS DESCRIBED BY THE PONTIAC DEALER THAT HER INSURANCE COMPANY TOWED THE SUV TO FOR REPAIRS. THE TRAILBLAZER SUSTAINED MUCH DAMAGE SUCH AS A BENT FRAME, BROKEN TRANSMISSION, ALL OF THE MOTOR MOUNTS AND THE TRANSMISSION MOUNTS BROKE LOOSE FROM THE FRAME, BENT STEERING WHEEL, AND ALL PARTS FROM THE ENGINE FORWARD ARE EITHER GONE OR BENT BEYOND REPAIR. WITH THIS VIOLENT OF A CRASH NO ONE HAS BEEN ABLE TO TELL US WHY THE AIR BAGS DID NOT DEPLOY. WE BOUGHT THIS SUV USED FROM A CHEVY DEALER IN JULY OF 2005 AND IT HAD AROUND 8000 MILES ON IT AT THAT TIME. I WOULD LIKE TO KNOW IF THERE IS SOME WAY OF CHECKING THE FUNCTIONALLY OF THIS AIR BAG TO SEE IF THERE MAY BE A POSSIBLE PROBLEM WITH IT. HER CRASH WAS HEAD ON AND IN MY OPINION VIOLENT ENOUGH TO ACTIVATE THE DRIVER SIDE AIR BAG. ANY SUGGESTIONS AS TO WHAT WE SHOULD DO? *TR
10256371	CHEVROLET	TRAILBLAZER	2005	2009-01-12	TL*THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. THE CONTACT WAS THE PASSENGER IN A VEHICLE TRAVELING 35 MPH ON ICY ROAD CONDITIONS. ANOTHER VEHICLE PULLED OUT IN FRONT OF THEM AND CRASHED INTO THE VEHICLE. THE VEHICLE WAS DESTROYED AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT WAS TRANSPORTED TO THE HOSPITAL BY AMBULANCE. HER NECK WAS SNAPPED BACKWARDS. THE SEAT BELT PROPERLY RESTRAINED HER AT THE TIME OF THE CRASH. A POLICE REPORT WAS FILED AND THE OTHER DRIVER RECEIVED A CITATION. THE DEALER WAS UNABLE TO DETERMINE WHY THE AIR BAGS FAILED. THE FAILURE MILEAGE WAS 80,000.
10266680	CHEVROLET	TRAILBLAZER	2005	2009-04-20	AIRBAGS DID NOT DEPLOY. A DRIVER PULLED OUT IN FRONT OF MY WIFE. SHE WAS TRAVELING AT NEARLY 40MPH. SHE STRUCK ANOTHER VEHICLE BROAD SIDE. THE AIRBAGS DID NOT DEPLOY. THE FRONT BUMPER FROM OUR TRAILBLAZER WAS ABOUT 30 YARDS BEHIND OUR VEHICLE. MY WIFE EXPERIENCED SEVERE BRUISING TO ABD AND CHEST. HER SEATBELT WAS IN USE. *TR
10269109	CHEVROLET	TRAILBLAZER	2005	2009-04-13	LOST CONTROL OF CAR ON NARROW ROAD UNDER NORMAL DRIVING CONDITIONS. COLLISION INTO TWO TREES HEAD ON. DRIVER SIDE AIRBAG NEVER DEPLOYED. *TR
10328284	CHEVROLET	TRAILBLAZER	2005	2010-04-29	I WAS IN AN ACCIDENT WHERE ANOTHER DRIVER PULLED OUT IN FRONT OF ME CROSSING ONCOMING TRAFFIC. I HIT HIM BROADSIDE DOING APPROXIMATELY 30-35 MILES PER HOUR. MY FRONT END WAS NEARLY SHOVED ALL THE WAY UP TO THE WINDSHIELD. MY 2005 TRAILBLAZER WAS TOTALED. MY AIRBAG DID NOT DEPLOY AND IF IT WASN'T FOR MY SEATBELT I WOULD HAVE WENT THROUGH THE WINDSHIELD THE IMPACT WAS SO HARD. I SUSTAINED A HURT SHOULDER AND ARM AND PROBABLY WOULDN'T HAD SUCH A PAINFUL INJURY IF THE AIRBAG HAD OF DEPLOYED. *TR
10357310	CHEVROLET	TRAILBLAZER	2005	2010-07-09	TL* THE CONTACT OWNS A 2005 CHEVROLET TRAIL BLAZER. THE CONTACT WAS DRIVING 50 MPH ON A SLICK MOUNTAIN ROAD WHEN THE VEHICLE HYDROPLANED AND CRASHED INTO THE SIDE OF A MOUNTAIN BEFORE FALLING INTO A DITCH. THE AIR BAGS DID NOT DEPLOY AND THE CONTACT AND TWO PASSENGERS SUSTAINED INJURIES. THE VEHICLE WAS DESTROYED. THE VEHICLE WAS NOT INSPECTED FOR THE FAILURE OF THE AIR BAGS. THE CONTACT WAS ADVISED BY HIS INSURANCE ADJUSTER THAT THE AIR BAGS SHOULD HAVE DEPLOYED. A POLICE REPORT WAS AVAILABLE. THE VIN WAS NOT AVAILABLE. THE FAILURE AND CURRENT MILEAGE WAS APPROXIMATELY 100,000.
10398899	CHEVROLET	TRAILBLAZER	2005	2011-04-28	AIR BAG DID NOT DEPLOY IN HEAD-ON COLLISION. *TR
10470760	CHEVROLET	TRAILBLAZER	2005	2012-07-27	TL* THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT THE DRIVER WAS TRAVELING BETWEEN 30 AND 40 MPH WHEN THE VEHICLE CRASHED INTO ANOTHER VEHICLE HEAD ON AND THE AIR BAGS FAILED TO DEPLOY. THE DRIVER SUSTAINED INJURIES TO THE HEAD, MOUTH, CHEST, LEG, AND WRIST. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE VEHICLE WAS NOT TAKEN TO THE DEALER. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE AND CURRENT MILEAGE WAS 40,000.
10475331	CHEVROLET	TRAILBLAZER	2005	2012-06-27	TL* THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. THE CONTACT WAS TRAVELING 45 MPH WHEN HE CRASHED AGAINST THE STREET MEDIAN, A UTILITY POLE AND THEN INTO A BUILDING. THE CONTACT STATED THAT NONE OF THE AIR BAGS IN THE VEHICLE DEPLOYED. THE CONTACT SUSTAINED LESIONS TO THE FACE, A CONTUSION TO THE RIGHT EYE AND CONTUSIONS TO THE CHEST AND LOWER ABDOMEN AREA. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE, VEHICLE WAS INSPECTED HOWEVER, THE FINDINGS WERE NOT DISCLOSED TO CONTACT. THE FAILURE AND CURRENT MILEAGE WAS 118,000.

10477042	CHEVROLET	TRAILBLAZER	2005	2012-09-17	TL* THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. THE CONTACT WAS DRIVING IN RAINY WEATHER AT VARIOUS SPEEDS WHEN HE UNEXPECTEDLY CRASHED INTO ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED FOR THE INCIDENT. THE CONTACT SUSTAINED SEVERE HEAD TRAUMA AND WAS TRANSPORTED BY AN AMBULANCE TO THE HOSPITAL. THE VEHICLE WAS DESTROYED AND TOWED TO A SAVAGE FACILITY. THE MANUFACTURER WAS NOT NOTIFIED OF THE PROBLEM. THE APPROXIMATE FAILURE MILEAGE WAS 122,000. UPDATED 10/31/12 *BF UPDATED 11/02/12
10477257	CHEVROLET	TRAILBLAZER	2005	2012-05-20	TL* THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING 30 MPH ATTEMPTING TO AVOID IMPACTING A DEER ON THE ROAD, HE CRASHED OFF A 9 FOOT EMBANKMENT AND NONE OF THE AIR BAGS DEPLOYED. THE CONTACT BECAME UNCONSCIOUS AFTER HIS HEAD CRASHED INTO THE STEERING WHEEL. ALSO, THE CONTACT SUFFERED SEVERE NECK INJURIES. THE VEHICLE WAS INSPECTED BY THE DEALER BUT THE RESULTS WERE INCONCLUSIVE. THE MANUFACTURER WAS NOTIFIED BUT OFFERED NO ASSISTANCE. THE FAILURE AND CURRENT MILEAGE WAS 108,429. THE VIN WAS UNAVAILABLE. UPDATED 10/31/12 *CN UPDATED 11/9/2012 *JS
10669444	CHEVROLET	TRAILBLAZER	2005	2014-11-18	HIT BLACK ICE. TRUCK SLID OFF THE ROAD AND FRONT END IMPACTED THE DITCH CAUSING HEAVY DAMAGE TO THE FRONT END. AIR BAG FAILED TO DEPLOY CAUSING INJURY. *JS
10678235	CHEVROLET	TRAILBLAZER	2005	2015-01-21	TL*THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING AT 25 MPH, ANOTHER VEHICLE CRASHED INTO THE FRONT PASSENGER SIDE OF THE CONTACT'S VEHICLE. AS A RESULT, THE CONTACT CRASHED INTO A SIGN AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED BACK INJURIES AND THE PASSENGER SUSTAINED NECK AND BACK INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE CONTACT WAS UNABLE TO CONFIRM IF THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 122,000. THE VIN WAS UNAVAILABLE.
10689540	CHEVROLET	TRAILBLAZER	2005	2015-02-16	TL* THE CONTACT OWNED A 2005 CHEVROLET TRAILBLAZER. WHILE DRIVING VARIOUS SPEEDS, THE VEHICLE SLID AND CRASHED. THE DRIVER SIDE AIR BAG FAILED TO DEPLOY. THE VEHICLE WAS NOT INCLUDED IN NHTSA CAMPAIGN NUMBER: 06V417000 (AIR BAGS). THE CONTACT SUSTAINED LACERATIONS TO THE FACE, STITCHES UNDER THE EYEBROWS ON BOTH EYES, AND AN INJURED NECK THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE VIN WAS NOT AVAILABLE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS NOT AVAILABLE.
10721128	CHEVROLET	TRAILBLAZER	2005	2015-04-27	2005 CHEVY TRAILBLAZER WAS DRIVEN BY MY GRANDDAUGHTER. SHE WAS TRYING TO ENTER ONTO I-10 INTERSTATE AND WAS GOING TOO FAST ON THE ENTRANCE RAMP. ROAD CONDITIONS WERE HAZARDOUS AS IT WAS A SEVERE RAIN STORM. SHE HYDROPLANED AND HIT A VEHICLE IN FRONT OF HER WHICH CAUSED HER TO SPIN INTO ONCOMING TRAFFIC. SHE WAS HIT ON THE DRIVER'S SIDE AND THE TRUCK SPUN AROUND SEVERAL TIMES BEFORE IT STOPPPED. THE AIRBAG DID NOT DEPLOY!!! THE POLICE OFFICER AND THE TOW COMPANY DRIVER SAID SHE WAS LUCKY TO BE ALIVE. MY CONCERN IS THIS COULD HAVE BEEN A FATAL ACCIDENT AND THE AIRBAG FAILED TO DEPLOY. THE TRAILBLAZER WAS TOTALED AS THE AXLE AND THE ENGINE WERE ON THE GROUND. THE DRIVER'S SIDE FRONT WHEEL CAME OFF. I HAVE ALWAYS LIKE CHEVY VEHICLES BUT AM NOW HESITANT TO PURCHASE ANOTHER ONE B/C OF THIS ISSUE WITH THE AIR BAG.
10885198	CHEVROLET	TRAILBLAZER	2005	2016-06-20	HEAD ON COLLISION BOTH VEHICLES TRAVELING ABOUT 30MPH ON IMPACT AND TRAILBLAZER AIR BAGS DID NOT DEPLOY. I HAD MY SEATBELT ON AND WAS NOT INJURED.
10983668	CHEVROLET	TRAILBLAZER	2005	2017-05-02	TL* THE CONTACT OWNS A 2005 CHEVROLET TRAILBLAZER. WHILE DRIVING 35 MPH, THE CONTACT CRASHED INTO THE REAR OF ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE DRIVER SUSTAINED VARIOUS INJURIES TO THE FACE, WHICH REQUIRED MEDICAL ATTENTION. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE VEHICLE WAS TOWED TO A TOW YARD AND WAS NOT DIAGNOSED FOR THE AIR BAG FAILURE. THE FAILURE MILEAGE WAS 140,000.
11011530	CHEVROLET	TRAILBLAZER	2005	2017-07-27	AIRBAG DID NOT WORK
10111298	GMC	ENVOY	2005	2005-01-25	COMPLAINT RECEIVED VIA E-MAIL. MY WIFE WAS IN HER 2005 GMC ENVOY WHEN IT WAS HIT ON THE DRIVER'S TIRE, AND WAS DRIVEN INTO A CONCRETE POWER POLE AT 40 MPH HEAD ON. THE POWER LINES WERE KNOCKED DOWN. DRIVER'S SIDE AIR BAG NEVER DEPLOYED, AND HER HEAD HIT THE STEERING, CAUSING A BUMP ON THE HEAD, A BLACK EYE AND A CUT LIP.*AK
10119967	GMC	ENVOY	2005	2005-04-22	SEVERE CAR CRASH WITH MY LEASED 2005 GMC ENVOY. MUCH SIDE AND FRONT DAMAGE OCCURED, BUT AIR BAGS DID NOT DEPLOY. GMC WILL BE SENDING SOMEONE FROM THE PROTECTION ALLEGATION DEPARTMENT TO PERFORM A DIAGNOSTIC TEST ON THE AIR BAGS WITHIN THE NEXT 14 DAYS. THE ACCIDENT OCCURED ON 4/22/05. I DO NOT WANT THE VEHICLE REPAIRED AND GIVEN BACK TO ME FOR THE FOLLOWING 2 REASONS: THE VEHICLE INCURRED (IN MY OPINION, POLICE REPORT, ALLSTATE INSURANCE CO., STERLING AUTO BODY REPAI SHOP) ETC ... EXTENSIVE DAMAGE. THE 2ND REASON IS THE AIRBAGS, AS STATED, DID NOT DEPLOY. IF ANYONE WERE TO BE SEATED IN THE PASSENGER SEAT, THEY WOULD HAVE BEEN SERIOUSLY HURT. I HAVE READILY AT MY DISPOSAL ANY AND ALL ADDITIONAL INFO. WHICH I WILL GLADLY SUBMIT WHEN NECESSARY.

10183935	GMC	ENVOY	2005	2007-02-13	TL* - THE CONTACT OWNS A 2005 GMS ENVOY. IN MID FEBRUARY 2007 THE CONTACT'S VEHICLE WAS INVOLVED IN A HEAD ON COLLISION WHILE DRIVING AT 35 MPH. THE CONTACT DROVE INTO A TREE DUE TO ICY ROAD CONDITIONS. NONE OF THE AIR BAGS DEPLOYED. THERE WERE NO PASSENGERS IN THE VEHICLE. THE CONTACT WAS WEARING A SEAT BELT. THERE WERE NO WARNING INDICATOR LIGHTS ON THE DASHBOARD BEFORE OR AFTER THE CRASH. THE VEHICLE WAS TOWED TO A THE DEALER, AND THE INSURANCE COMPANY ADVISED THE CONTACT THAT THE VEHICLE WAS TOTALED. THE CONTACT HAD REQUESTED THAT THE MANUFACTURER ISSUE A COMPUTER READ OUT INDICATING WHY THE AIR BAGS DIDN'T DEPLOY. THE DEALER SENT THE CONTACT PRIOR TO THE COLLISION A DIAGNOSTIC EMAIL STATING THE VEHICLE WAS OPERATING NORMALLY. A POLICE REPORT WAS TAKEN. THE CURRENT AND FAILURE MILEAGE WERE BOTH 25000.*AK
10257735	GMC	ENVOY	2005	2009-01-28	TL*THE CONTACT OWNS A 2005 GMC ENVOY. THE CONTACT WAS INVOLVED IN A HEAD-ON CRASH. THE CONTACT WAS SEVERELY INJURED AND THE ENTIRE FRONT END OF THE VEHICLE WAS CRUSHED. ALL FOUR TIRES BLEW OUT AND THE FRONTAL AIR BAGS FAILED TO DEPLOY. THERE WERE NO OTHER PASSENGERS IN THE VEHICLE AND NO MAINTENANCE WAS PERFORMED ON THE VEHICLE PRIOR TO THE CRASH. THE VEHICLE WAS DESTROYED AND TOWED FROM THE SCENE. A POLICE REPORT WAS FILED. THE MILEAGES, SPEED, AND VIN WERE UNKNOWN.
10463248	GMC	ENVOY	2005	2011-07-15	TL* THE CONTACT OWNED A 2005 GMC ENVOY. THE CONTACT STATED WHILE DRIVING 55 MPH, HE CRASHED INTO A TREE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED MINOR TISSUE DAMAGE ON THE UPPER BODY FROM THE IMPACT. THE VEHICLE WAS TOWED TO A REPAIR SHOP, WHERE IT WAS DECLARED DESTROYED. A POLICE REPORT WAS FILED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE; HOWEVER, THEY PROVIDED NO ASSISTANCE. THE CURRENT AND FAILURE MILEAGE WERE UNAVAILABLE. UPDATED 09/24/2012 *JS THE CONSUMER STATED THE ACCIDENT WAS INITIATED BY A VEHICLE GOING WEST BOUND THAT CROSSED THE SOLID DOUBLE LINES, ULTIMATELY CAUSING A DOMINO EFFECT. THE CONSUMER'S VEHICLE WAS DAMAGED WHEN HE TRIED TO AVOID HITTING THE VEHICLE BY SWERVING SIDEWAYS AND SLIDING INTO THE GRASS. HE TRIED STOPPING THE VEHICLE WHILE IT WAS STILL ON THE PAVEMENT BUT HE INEVITABLY RAN INTO THE DITCH AND FLEW AIRBORNE INTO A TREE, AND THE TRUCK OVERTURNED. UPDATED 03/25/14 UPDATED 01//22/15. *JB.....UPDATED 03/17/16 *BF UPDATED 09/06/16.*JB UPDATED 09/18/2017*JS *JS
10503799	GMC	ENVOY	2005	2013-03-15	THE ACCIDENT HAPPENED ON 2-15-2013 ON PENNSYLVANIA AVENUE SE DURING RUSH HOUR THE OTHER CAR DID NOT YIELD TO ONGOING TRAFFIC ON PENNSYLVANIA AVENUE AND DODGED OUT FROM A SIDE STREET AND HIT MY VEHICLE ON THE FRONT SIDE AND MY SON WHO IS 13 HEAD HIT THE DASHBOARD AND MY DAUGHTERS DOG FLEW FROM THE BACK SEAT UP TO THE FRONT. THE OTHER VEHICLE AIRBAG DID DEPLOY BUT MINES DID NOT. *TR
10607728	GMC	ENVOY	2005	2008-03-16	SINGLE CAR ACCIDENT WITH CAR RUNNING OFF ROAD RAN INTO DITCH, OVERTURNED AND HITTING PHONE POLE. AIRBAG DID NOT DEPLOY. QUESTIONABLE SEAT BELT ISSUES. *TR
10632374	GMC	ENVOY	2005	2011-09-16	ON SEPTEMBER 16TH, 2011, I WAS INVOLVED IN AN AUTO ACCIDENT THAT WAS A HEAD ON CRASH. THE AIR BAGS NEVER DEPLOYED AND I SUSTAINED BACK INJURIES. ON SITE OF THE ACCIDENT MY BACK WAS HURTING SOME BUT DID NOT GO TO HOSPITAL UNTIL LATER THAT EVENING, AFTER THE ADRENALIN AND THE SHOCK WORE OFF. I NOW HAVE SEVER BACK PROBLEMS WITH A LOT OF PAIN AND WAS DECLARED DISABLED IN 2012. AT THE TIME OF DOING RESEARCH I WAS TOLD BY ON-STAR, WHICH NEVER CAME ON, THAT IF MY AIR BAGS DIDN'T DEPLOY THEY WOULDN'T COME ON.. BUT, THE FRAME WAS BENT SO BAD THAT THEY TOTALED THE VEHICLE, WITH A LOT OF OTHER DAMAGE. THE WHOLE FRONT WAS DAMAGED, THE BUMPER WAS DESTROYED ALONG WITH DAMAGE TO THE MOTOR. AND WE COULD NOT UNDERSTAND WHY THE AIR BAGS DID NOT DEPLOY. *TR
10908300	GMC	ENVOY	2005	2016-08-22	I HAD THREE CARS IN FRONT OF ME STOPPED. I DID NOT SEE ANY BREAKL LIGHTS AND I HIT THE CAR IN FRONT OF ME PUSHING THE OTHER CARS TO HIT EACH OTHER. MY FRONT END OF MY CAR WAS SEVERELY DAMAGED BAD ENOUGH TO DAMAGE THE RADIATOR AND DESTROY MY AC UNIT. I'M NOT SURE WHAT ELSE WAS DAMAGED. IT SENT THE PERSON IN FRONT OF ME AND MYSELF TO THE EMERGENCY ROOM. " MY AIR BAGS DID NOT DEPLOY ". MY VEHICLE WAS MOVING ON A CITY STREET.

10370915	ISUZU	ASCENDER	2005	2010-12-10	I WAS DRIVING EAST ON INTERSTATE 10 IN PENSACOLA, FLORIDA. A VEHICLE TRAVELING WEST LOST CONTROL AND CAME ACROSS THE SLOPED GRASSY MEDIAN, OVERTURNED AND SLID ACROSS MY TRAFFIC LANE, CAUSING ME TO CRASH INTO THEIR ROOF. MY ODOMETER SAYS AT THE POINT OF IMPACT I WAS ONLY TRAVELING 48 MPH. ONCE I REALIZED I WAS ALIVE, I WAS IN AWE THAT THE AIRBAG DID NOT DEPLOY. I SPOKE TO A MANAGER AT ISUZU IN CALIFORNIA. HE REQUESTED THE VIN NUMBER AND SOME OTHER PERSONAL INFORMATION AND SAID IF THE INSURANCE COMPANY ADJUSTER SAW ANY MANUFACTURER DEFECTS, THEN THE INSURANCE COMPANY WOULD CONTACT ISUZU. I ALSO CONTACTED MY INSURANCE PROVIDER, THEY SAID SINCE I WAS NOT KILLED IN THE ACCIDENT, THEY WOULD NOT PURSUE ANYTHING WITH ISUZU. I THOUGHT SOMEONE SHOULD KNOW BECAUSE I WAS PINNED IN THE VEHICLE AND HAD TO BE CUT OUT. THE TOW TRUCK DRIVER ALSO MENTIONED SOMETHING ABOUT THE STEERING COLUMN HAD MALFUNCTIONED, NOT SURE WHAT THE MALFUNCTION WAS, BUT IT DID NOT DO WHAT IT WAS DESIGNED TO DO FOR SAFETY PURPOSES. I SUSTAINED A FRACTURED RIGHT FOOT, BRUISED LUNGS/RIBS, NUMEROUS LACERATIONS, BRUISED LEFT KNEE AND LEFT ELBOW. *TR
10449350	ISUZU	ASCENDER	2005	2012-02-20	WE HAD A CAR ACCIDENT AND THE AIRBAGS DIDN'T ACTIVATE...THE IMPACT WAS VERY HARD THAT THE INSURANCE COMPANY DECIDED TO TOTAL THE CAR BECAUSE THE DAMAGE WAS TO BIG...I AM PREGNANT AND I HAVE 2 MORE KIDS, AND I'M SO DISAPPOINTED WITH THIS EXPERIENCE THAT SOMETHING COULD HAPPENED TO ME OR MY KIDS IF WE WERE IN THE ACCIDENT. *TR
10228093	BUICK	RAINIER	2004	2008-03-20	MY FIANCE WAS IN ACCIDENT WITH MY SUV AND THE AIR BAG DIDN'T DEPLOY CAN I SUE THE COMPANY WHO SOLD ME THE VEHICLE? *TR
10266690	BUICK	RAINIER	2004	2009-04-05	WHILE TRAVELING AT A SPEED OF APPROX 50-55 ON A INTERSTATE, I WAS REARED ENDED BY A AUTO, MY AUTO WAS STRUCK THEN SHOVELD INTO A CEMENT WALL BLOCK AND THEN BOUNCED INTO ON COMING TRAFFIC TO THE OTHER CEMENT WALL BLOCK ON THE OPPOSITE SITE WHILE TRYING TO STOP, I WAS WEARING A SEAT BELT, THE VEHICLE'S AIR BAGS DIDN'T GO OFF AT ALL IN THE VEHICLE. A HEAD INJURY OCCURRED, NECK AND SHOULDER INJURIES OCCURRED. THE AUTO WAS A TOTAL LOSS! *TR
10638828	BUICK	RAINIER	2004	2012-11-17	A PERSON RAN TWO STOP SIGNS AND ENTERED VEHICLE PATH. THE TWO VEHICLES HIT HEAD ON AND THIS VEHICLE MADE IMPACT AT 40 MPH AFTER IT DECELERATED FROM 43 MPH. THE TWO VEHICLE HIT HEAD ON WITH NEAR PERFECT EVEN IMPACT, BASED UPON THIRD PARTY VISUAL DESCRIPTION OF THE FRONT END OF THE VEHICLES DAMAGE. THE VEHICLE DECELERATED AT A MAX SDM RECORDED VELOCITY CHANGE RATE OF -14.07 (MPH) AND A ALGORITHM ENABLED TO MAXIMUM SDM RECORDED VELOCITY CHANGE OF 127.5 MSEC. DRIVER OF THE VEHICLE HIT THE STEERING WHEEL WITH HEAD KNOCKING THE PERSON OUT. AIRBAGS DID NOT DEPLOY. ONSTAR WAS NOT NOTIFIED THAT THERE WAS AN ACCIDENT. COMPUTER SHOWS THE SEATBELT WAS WORN BY DRIVER. WHEN THE ONSTAR WAS MANUALLY ACTIVATED BY THE DRIVER WHEN HE CAME TOO, THE GPS SHOWED THE VEHICLE FURTHER NORTH UP THE ROAD CAUSING INCORRECT POLICE DIVISION BEING CALLED. VEHICLE WAS GOING UP HILL WHEN THE ACCIDENT OCCURRED. OTHER VEHICLE WAS GOING DOWNHILL. THE OTHER VEHICLE WAS A SUBARU. VEHICLE COMPUTER DATA WAS RETRIEVED BY A BOSCH CRASH DATA RETRIEVAL TOOL USING VERSION 8.0 SOFTWARE. I HAVE A COPY OF THIS DATA. GM REPORTS THAT THE COMPUTER WAS CORRECT NOT TO DEPLOY AIRBAGS AND NOT CALL FOR HELP USING ONSTAR. THE VEHICLE HAD A SOFTWARE MODIFICATION DUE TO A FAULT WITH THE FAN SPEED CALIBRATION SETTING OFF A WARNING LIGHT. WE HAD COMPLAINED THAT THINGS WERE NEVER CORRECT AFTER THIS MODIFICATION OF THE SOFTWARE AND TOOK THE VEHICLE TO TWO DIFFERENT DEALERSHIPS COMPLAINING THAT COMPUTERS WERE DOING STRANGE THINGS AFTER THIS FIRMWARE MODIFICATION. VEHICLE VIN: [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR

10638830	BUICK	RAINIER	2004	2012-11-17	A PERSON RAN TWO STOP SIGNS AND ENTERED VEHICLE PATH. THE TWO VEHICLES HIT HEAD ON AND THIS VEHICLE MADE IMPACT AT 40 MPH AFTER IT DECELERATED FROM 43 MPH. THE TWO VEHICLE HIT HEAD ON WITH NEAR PERFECT EVEN IMPACT, BASED UPON THIRD PARTY VISUAL DESCRIPTION OF THE FRONT END OF THE VEHICLES DAMAGE. THE VEHICLE DECELERATED AT A MAX SDM RECORDED VELOCITY CHANGE RATE OF -14.07 (MPH) AND A ALGORITHM ENABLED TO MAXIMUM SDM RECORDED VELOCITY CHANGE OF 127.5 MSEC. DRIVER OF THE VEHICLE HIT THE STEERING WHEEL WITH HEAD KNOCKING THE PERSON OUT. AIRBAGS DID NOT DEPLOY. ONSTAR WAS NOT NOTIFIED THAT THERE WAS AN ACCIDENT. COMPUTER SHOWS THE SEATBELT WAS WORN BY DRIVER. WHEN THE ONSTAR WAS MANUALLY ACTIVATED BY THE DRIVER WHEN HE CAME TOO, THE GPS SHOWED THE VEHICLE FURTHER NORTH UP THE ROAD CAUSING INCORRECT POLICE DIVISION BEING CALLED. VEHICLE WAS GOING UP HILL WHEN THE ACCIDENT OCCURRED. OTHER VEHICLE WAS GOING DOWNHILL. THE OTHER VEHICLE WAS A SUBARU. VEHICLE COMPUTER DATA WAS RETRIEVED BY A BOSCH CRASH DATA RETRIEVAL TOOL USING VERSION 8.0 SOFTWARE. I HAVE A COPY OF THIS DATA. GM REPORTS THAT THE COMPUTER WAS CORRECT NOT TO DEPLOY AIRBAGS AND NOT CALL FOR HELP USING ONSTAR. THE VEHICLE HAD A SOFTWARE MODIFICATION DUE TO A FAULT WITH THE FAN SPEED CALIBRATION SETTING OFF A WARNING LIGHT. WE HAD COMPLAINED THAT THINGS WERE NEVER CORRECT AFTER THIS MODIFICATION OF THE SOFTWARE AND TOOK THE VEHICLE TO TWO DIFFERENT DEALERSHIPS COMPLAINING THAT COMPUTERS WERE DOING STRANGE THINGS AFTER THIS FIRMWARE MODIFICATION. VEHICLE VIN: [XXX] INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6). *TR
11099015	BUICK	RAINIER	2004	2016-04-29	TL* THE CONTACT OWNED A 2004 BUICK RAINIER. WHILE DRIVING APPROXIMATELY 30 MPH IN THE RAIN, THE VEHICLE HYDROPLANED. THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO A WALL. AS A RESULT, THE CONTACT WAS RENDERED UNCONSCIOUS AND TRANSPORTED TO THE HOSPITAL VIA AMBULANCE. THE CONTACTS HEAD STRUCK THE DRIVER'S SIDE WINDOW AND THE CONTACT REMAINED IN A COMA FOR SEVERAL MONTHS. THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED INJURIES TO THE RIGHT SIDE OF THE HEAD, WHICH CAUSED WALKING COMPLICATIONS AND A LOSS OF FEELING IN THE RIGHT SIDE OF THE BODY. IN ADDITION, THE CONTACT SUFFERED A LOSS OF SIGHT IN THE RIGHT EYE DUE TO A CRUSHED SKULL. THE VEHICLE WAS TOWED TO A TOW LOT AND DEEMED DESTROYED. A DEALER WAS NOT MADE AWARE OF THE AIR BAG FAILURE. THE VEHICLE WAS NOT DIAGNOSED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS UNKNOWN.
10125145	CADILLAC	ESCALADE	2004	2005-05-11	INVOLVED IN A HORRIFIC AUTO ACCIDENT WITH OTHER VEHICLE. HIT IN FRONT PASSENGER & FRONT PART OF VEHICLE (BY RADIATOR AREA) AT HIGH SPEED. EST.SPEED APPROX. 45-55 MPH WITH NO SKID MARKS, OTHER VEHICLE STOPPED WHEN IT HIT US. NEW GM/ESCALADE-SUV/"04-WITH 11,000 MILES, BOUGHT NEW DECLARED TOTAL LOSS, WITH APPARENT SERIOUS FRAME DAMAGE/BENT 12 IN. AND FOUND STRESS CRK. SHOULD GIVE AN IDEA HIGH SPEED OTHER VEHICLE TRAVELING. 8-10 SECONDS FROM IMPACT, ONSTAR CAME ON AUTOMATICALLY, THEY RECD. EMERGENCY MESSAGE VIA SATELLITE, VEHICLE HAD BEEN IN A SERIOUS MVA AND AIR BAGS DEPLOYED. WE DIDN'T CALL ONSTAR THEY CALLED US. NEXT DAY WE CALLED ASKED HOW THEY KNEW WE WERE ACCIDENT. TOLD US DEPENDING ON THE SEVERITY, THEY GET CERTAIN SIGNALS, WHICH OURS HAD ADVISED OF SERIOUSNESS & AIRBAG DEPLOYMENT. UNBELIEVABLY, NONE OF OUR 4 AIRBAGS DEPLOYED. WE & HUNDREDS OF OUR FRIENDS ARE IN TOTAL DISBELIEF WHEN YOU SEE THE CONDITION VEIHICLE WAS LEFT IN & THAT 4 AIR BAGS DIDN'T DEPLOY. WE WERE INJURED BUT BY GRACE OF GOD INJURIES WERE NOT LIFE THREATENING. HEAD,UPPERANDLOWERBACK,NECK,LEGS,SHOULDER,HIPSAND ARMS EXTREMLEY SORE. HAS BEEN 33 DAYS SINCE THE ACCIDENT AND AM STILL FEELING PAINS & SERIOUS HEADACHES BUT ALIVE. HAVE DECIDED TO BECOME ADVOCATES AND REPORT ACCIDENT/INCIDENT TO POSSIBLY SAFE A PERSON(S) LIFE AND MAKE GENERAL MOTORS AWARE THAT THEY HAVE A POSSIBLE DEFECT IN THEIR AIR BAGS, LEADING TO MASSIVE RECALL AND POSSIBLY A CLASS ACTION LAW SUIT IF NOT FIXED. THIS IS A VERY SERIOUS MATTER. ANYTIME ANYONE IS HIT AT RATE OF SPEED THAT WE WERE, TO LEAVE BRAND NEW SUV ESCALADE A TOTAL LOSS/ 12 IN. BENT FRAME & STRESS CRACK & 4 AIR BAGS NOT DEPLOY - LEADS US TO BELIEVE OF A SERIOUS PROBLEM AND A SERIOUS ONE FOR GM/CADILLAC. CALL FOR FURTHER DETAILS (956) 533-0811 (956)358-5272. THANK YOU & GOD BLESS.
10127916	CADILLAC	ESCALADE	2004	2005-05-11	THE CONSUMER WAS INVOLVED IN AN A SERIOUS ACCIDENT AND THE AIR BAGS DID NOT DEPLOY. THERE WERE 2 INJURIES. *JB *SC

10152700	CADILLAC	ESCALADE	2004	2005-07-16	ON JULY 16TH, 2005; I WAS INVOLVED IN A LIFE CHANGING, SINGLE VEHICLE AUTO ACCIDENT. I STRUCK A HILL WITH THE FRONT RIGHT SIDE OF THE VEHICLE WITH ENOUGH EXCESSIVE FORCE TO FLIP THIS CADILLAC ESCALADE HEAD FIRST. THE ESCALADE FLIPPED TWICE, IMPACTING THE FRONT OF THE VEHICLE AND LANDING UP SIDE DOWN. ASTONISHINGLY, OUT OF THE FOUR AIR BAGS IN THIS VEHICLE, NOT ONE OF THEM DEPLOYED. I PURCHASED THIS 2004 ESCALADE BRAND NEW AND AT THE TIME OF THE ACCIDENT IT ONLY HAD 15,000 MILES. THE VEHICLE IS A TOTAL LOSS AND IT IS UTTERLY UNBELIEVABLE THAT THE AIR BAGS DID NOT DEPLOY. I WAS SO IMPRESSED WITH THE RAVED REVIEWS, CONSUMER REPORTS INCLUDING SAFETY FEATURES, AND STYLISH BODY THAT THIS CADILLAC ESCALADE BECAME THE VEHICLE OF MY DREAMS. NEEDLESS TO SAY, I AM VERY DISAPPOINTED WITH MY CADILLAC EXPERIENCE. I DO NOT TRUST THIS VEHICLE ENOUGH TO GET INTO ANOTHER ONE. I KNOW THAT I AM ONLY HERE BECAUSE GOD DECIDED THE SPARE MY LIFE. AS A DIRECT RESULT OF THIS ACCIDENT I FREQUENTLY SUFFER SEVERE MIGRAINES, DIZZY SPELLS, BLURRED VISION, MEMORY LOSS, AND ANXIETY/PANIC ATTACKS ALL WHICH KEEP ME FROM SLEEPING. IT IS EXTREMELY DIFFICULT TO COMMUTE FROM DOCTORS APPOINTMENTS AND WORK FOR FEAR OF ANOTHER ACCIDENT. THE NEXT WEEK I HAD SEVERE CHEST, SHOULDER AND LOWER BACK PAINS; ALL OF WHICH I AM BEING TREATED FOR ON A REGULAR BASIS. I ALSO SEEK TREATMENT FROM A NEUROLOGIST FOR THE HEAD INJURY. I BELIEVE THAT THIS VEHICLE HAS A SERIOUS PROBLEM WITH THE AIR BAGS AND GM SHOULD STRONGLY CONSIDER INVESTIGATING THIS MATTER. *NM
10386829	CADILLAC	ESCALADE	2004	2010-02-10	TL* THE CONTACT OWNS A 2004 CADILLAC ESCALADE. WHILE DRIVING APPROXIMATELY 65-75 MPH, THE CONTACT FELL ASLEEP. THE VEHICLE DRIFTED OFF THE ROAD AND CRASHED INTO A BRIDGE BARRIER. THE CONTACT SUSTAINED A BROKEN WRIST AND FACIAL LACERATIONS. THE FRONT SEAT PASSENGER WAS AIR-LIFTED TO THE HOSPITAL AND SUSTAINED A BROKEN RIGHT LEG AND SEVERE FACIAL INJURIES. THE REAR SEAT PASSENGER SUSTAINED INJURIES TO THE SPINE. THE AIRBAGS FAILED TO DEPLOY WITH THE MASSIVE IMPACT. A POLICE REPORT WAS FILED AND THE VEHICLE WAS TOWED TO A COLLISION CENTER. UPDATED 10/14/11
10436436	CADILLAC	ESCALADE	2004	2011-11-01	I WAS IN AN MVA ON NOV. 1, 2011 THAT TOTALED MY 2004 ESCALADE. NONE OF THE AIRBAGS DEPLOYED, DESPITE DAMAGE TO ALL SIDES OF THE AUTOMOBILE, INCLUDING FRONT END IMPACT. THE CAR ACTUALLY ROLLED. THE FRAME WAS BENT AND THE FRONT HIT AN EMBANKMENT NOSE FIRST WITH GREAT IMPACT. I SUFFERED SEVERAL INJURIES, INCLUDING HEAD TRAUMA. *TR
10324984	CADILLAC	SRX	2004	2010-01-19	2004 CADILLAC SRX INVOLVED IN A FRONT END RASH ON JAN 19, 2010. SEVERE FRONT END CRASH HOWEVER AIRBAGS DID NOT DEPLOY. *TR
10638570	CADILLAC	SRX	2004	2014-09-17	TL* THE CONTACT OWNS A 2004 CADILLAC SRX. THE CONTACT STATED THAT A TIRE BLEW OUT CAUSING THE VEHICLE TO SPIN OUT OF CONTROL AND CRASH. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED AND ONE INJURY WAS REPORTED THAT DID NOT REQUIRE MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 120,000.
10245434	CHEVROLET	ASTRO	2004	2008-10-10	MY WIFE WAS DRIVING A 2004 CHEVY ASTRO VAN APPROX. 35-40 MPH ON A TWO-WAY STREET. ANOTHER DRIVER FROM THE OPPOSITE DIRECTION CUT ACROSS INTO HER LANE AND HAD A HEAD-ON COLLISION. SHE SUFFERED A BROKEN WRIST & BRUISED RIBS. SHE HAD THREE OF OUR CHILDREN IN THEIR SEATS. THEY WERE SHAKEN AND HAD SEATBELT BRUISES. THE VAN WAS NOT DRIVABLE AND WAS TOWED AWAY. THE POLICE & THE TOW DRIVER REPORTED THAT THE AIRBAGS DID NOT DEPLOY. WE HAVE SOME EXPECTATION THAT THE AIRBAGS WOULD HAVE SECONDARY ROLE TO MINIMIZE INJURIES. MY COMPLAINT THAT THE HARD COLLISION WAS SUFFICIENT TO DEPLOY SAFETY EQUIPMENT BUT DID NOT WORK AS DESIGNED. WAS THERE A RECALL FOR AIRBAG FAILURES FOR THIS MODEL OF VEHICLE? *TR
10057529	CHEVROLET	SILVERADO	2004	2004-01-27	WHILE DRIVING 40 MPH VEHICLE WAS INVOLVED IN A HEAD ON COLLISION. UPON IMPACT, DUAL AIR BAGS DID NOT DEPLOY. PASSENGER SUSTAINED INJURIES TO NECK, JAW, AND A BROKEN ARM. *AK *JB
10065268	CHEVROLET	SILVERADO	2004	2004-03-30	WHILE DRIVING 60 MPH DRIVER APPLIED THE BRAKES AND PEDAL WENT TO THE FLOOR. THIS CAUSED THE DRIVER TO LOSE CONTROL OF THE VEHICLE, AND HIT ANOTHER VEHICLE ON THE PASSENGER SIDE. UPON IMPACT, BOTH AIR BAGS DID NOT DEPLOY. THERE WERE NO INJURIES. *AK
10073357	CHEVROLET	SILVERADO	2004	2004-05-10	THE CONSUMER STATED THE FRONTAL AIR BAGS DID NOT DEPLOY DURING AN ACCIDENT. THERE WERE NO INJURIES. THE DRIVER HAD THE VEHICLE TOWED TO A BODY SHOP. *JB WHILE TRAVELING AT 30 MPH AND APPROACHING AN INTERSECTION, A SECOND VEHICLE ENTERED ON THE CONSUMER'S LEFT HAND SIDE, THERE WAS NO TIME TO REACT, THE CONSUMER STRUCK THE SECOND VEHICLE ON IT'S RIGHT SIDE. THE DRIVERS SIDE AIR BAG DID NOT DEPLOY. *SC *JB
10083968	CHEVROLET	SILVERADO	2004	2004-06-19	WHILE DRIVING AT 35 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A FRONTAL COLLISION. UPON IMPACT, NONE OF THE FRONTAL AIRBAGS DEPLOYED. DRIVER SUSTAINED MINOR BRUISES TO THEIR CHEST FROM THE SEAT BELT, AND THE FRONT PASSENGER SUSTAINED A BRUISED KNEE. THIS COLLISION RESULTED IN \$800.00 FRONTAL DAMAGE. *AK

10086614	CHEVROLET	SILVERADO	2004	2004-08-06	2001 CHEVROLET PICKUP INVOLVED IN A CRASH WITH A TREE AND AIR BAG DID NOT DEPLOY. DRIVE SUSTAINED SEVERE INJURY TO MOUTH BY HITTING STEERING WHEEL, DISPLACING FIVE LOWER FRONT TEETH CAUSING EXTENSIVE PAIN HAVING TEETH REPOSITIONED. *JB
10105126	CHEVROLET	SILVERADO	2004	2004-12-10	WHILE DRIVING 60 MPH VEHICLE HYDROPLANED, LOST CONTROL, AND CRASHED INTO A BUILDING HEAD ON . UPON IMPACT, DRIVER'S SIDE AIR BAG DID NOT DEPLOY, AND PASSENGER'S SIDE AIR BAG WAS DEACTIVATED. NO INJURIES REPORTED. *AK
10117538	CHEVROLET	SILVERADO	2004	2005-04-01	CONSUMER'S VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH AN OAK TREE AT 5 MPH. UPON IMPACT, NEITHER FRONTAL AIR BAG DEPLOYED. ALTHOUGH CONSUMER WAS PROPERLY RESTRAINED THE CRASH PUSHED THE ENGINE THROUGH THE FIREWALL AGAINST THE PASSENGER'S SEAT. DRIVER SUSTAINED INJURIES, AND AN AMBULANCE TRANSPORTED THE DRIVER TO THE LOCAL HOSPITAL. *AK
10134302	CHEVROLET	SILVERADO	2004	2005-08-23	DT: 2004 CHEVROLET SILVERADO. THE CONSUMER WAS IN AN ACCIDENT ON AUGUST 23, 2005. WHILE DRIVING 40 MPH. A DEER CAME ONTO THE ROAD, CONSUMER'S VEHICLE SWERVED TO AVOID IT, AND WENT INTO RAVINE. TOOK OUT TWO TREES. THIS DAMAGED THE FRONT END OF THE VEHICLE. UPON IMPACT, THE AIRBAGS DID NOT DEPLOY. THE VEHICLE WAS DRIVEN HOME, AND IS CURRENTLY AT THE AUTO BODY SHOP. THERE HAS BEEN NO DETERMINATION AS TO WHY THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT TAKEN. THE CONSUMER SUSTAINED INJURIES. SHE BRUISED THE CHEST, AND SHE HAD A BULGING DISC I NECK NEAR SPINAL CORD. *AK
10134631	CHEVROLET	SILVERADO	2004	2005-08-28	DT: THE CONTACT OWNS A 2004 CHEVROLET SILVERADO. THE CONTACT'S VEHICLE WAS INVOLVED IN A FRONT END COLLISION WHILE TRAVELING 65 MPH ON AUGUST 28, 2005. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THERE WERE NO WARNING LIGHTS ON INDICATING THERE WAS A PROBLEM WITH THE AIR BAG SYSTEM. THE CONTACT STATED ANOTHER VEHICLE LOST CONTROL OF AND HIT THE SIDE OF CONTACT'S VEHICLE, CAUSING IT TO HIT THE CENTER MEDIAN. THE CONSUMER CONTACTED THE DEALERSHIP AND THE MANUFACTURER. *AK
10141161	CHEVROLET	SILVERADO	2004	2005-10-25	DT: THE CONTACT STATED THE COMPANY TRUCK THAT HE DROVE WAS INVOLVED IN AN ACCIDENT. UPON IMPACT, THE AIRBAGS DID NOT DEPLOY. THE ENTIRE FRONT END OF THE VEHICLE WAS DESTROYED. THE CONTACT SUSTAINED INJURIES. HE BRUISED HIS CHEST, SHIN AND TORE THE TENDON IN HIS ANKLE. THERE HAD BEEN NO ACCIDENTS IN THIS VEHICLE PRIOR TO THIS. A POLICE REPORT WAS TAKEN AT THE SCENE. *AK
10149082	CHEVROLET	SILVERADO	2004	2006-01-10	ON JAN. 10 OF 2006 I LOST CONTROL OF MY 2004 CHEVY SILVERADO WHILE I WAS DRIVING ON ICY ROAD. I HIT A CONCRETE DIVIDER HEAD ON. MY CONCERN IS THAT THE AIR BAG NEVER DEPLOYED EVEN THOUGH THE DAMAGE TO THE TRUCK WAS QUITE BIG. I WAS GIVEN A ESTIMATE OF \$9820 OF DAMAGE BECAUSE THEY HAVE TO REPLACE THE BODY FRAME. EVEN WITH ALL THIS DAMAGE MY AIRBAG NEVER DEPLOYED. *NM
10153763	CHEVROLET	SILVERADO	2004	2006-03-20	WHILE DRIVING ON SLICK ROADS MY TRUCK WENT OFF THE ROAD, DOWN A HILL AND CRASHED INTO AN EMBANKMENT. THE ENTIRE FRONT END WAS SEVERELY DAMAGED. THE FRAME WAS BENT, THE BUMPER WAS WRAPPED UP UNDER THE FENDER, GRILL GUARD PUSHED INTO THE RADIATOR. UPON IMPACT NEITHER OF THE AIRBAGS DEPLOYED. MY FACE SLAMMED INTO THE STEERING WHEEL BREAKING MY NOSE. TRUCK SALVAGED. *JB
10155380	CHEVROLET	SILVERADO	2004	2006-02-19	I HAD AN ACCIDENT IN MY 2004 CHEVY TRUCK AT A SPEED OF APPROX 80 MPH HEAD ON IMPACT. THE TRUCK WAS TOTALED BUT MY AIR BAGS DIDN'T WORK. I MADE A COMPLAINT TO GMAC, THEY HAD AN INVESTIGATION AND ACCORDING TO THEM THERE WAS NOTHING WRONG WITH THE AIR BAGS. I FIND THAT HARD TO BELIEVE WITH THAT KIND OF IMPACT, THIS IS A SAFETY ISSUE AND I HAVE 2001 CHEVY SUBURBAN THAT MY WIFE DRIVES WITH MY CHILDREN. CAN YOU PLEASE LOOK INTO THIS BECAUSE I WOULD LIKE TO KNOW GMAC IS NOT TAKEN RESPONSIBILITY FOR THE AIR BAG FAILURE. THANK GOD I WAS WEARING MY SEAT BELT , BECAUSE IT WAS THE ONLY THING THAT SAVED MY LIFE. *NM
10156562	CHEVROLET	SILVERADO	2004	2004-09-04	DT*: THE CONTACT STATED WHILE STOPPED AT A STOP SIGN, THE VEHICLE WAS HIT ON THE DRIVER'S SIDE FRONT END. THE AIR BAGS DID NOT DEPLOY. SEAT BELTS WERE IN USE HOWEVER BACK AND NECK INJURIES WERE SUSTAINED. THE IMPACT WAS SO SEVERE; BOTH PASSENGER TIRES CAME OFF THE RIMS AND DUG INTO THE PAVEMENT. THE POLICE WERE ON SCENE AND A REPORT WAS FILED. THE VEHICLE WAS TOWED TO DEALER, UPON INSPECTION NO DETERMINATION COULD BE MADE WHY THE AIR BAGS DID NOT DEPLOY. THE MANUFACTURER WAS ALERTED. UPDATED 05/16/06. *JB
10202240	CHEVROLET	SILVERADO	2004	2006-02-08	I WAS DRIVING UP TP A STOP LIGHT WHEN THE LIGHT TURNED RED THERE WAS A CAR IN FRONT OF ME THAT HAD STOPPED, I REALIZED I DIDN'T HAVE A LOT OF ROOM BUT THOUGHT IT WOULD BE ENOUGH TO STOP. I PUT THE PEDAL TO THE FLOOR AND STILL HIT THEM TWO PEOPLE WERE INJURED. *TR THEN ON 9/8/07 AND A DEER RAN OUT IIN FRONT OF ME, AGAIN MY FOOT TO THE FLOOR I HIT THE DEER. 1ST I WAS SUPRISED THAT MY AIR BAGS DIDN'T DEPLOY (REALLY TORE UP THE FRONT OF THE TRUCK) AND 2ND I SHOULD OF BEEN ABLE TO SLOW DOWN IN TIME. AFTER READING ALL OF THE ISSUES WITH THE BRAKES ON CHEVYS AND NO ONE IS DOING ANYTHING ABOUT IT, I THINK ITS TIME TO LOOK FOR A DIFFERENT CAR COMPANY.

10238395	CHEVROLET	SILVERADO	2004	2008-01-22	TL*THE CONTACT OWNS A 2004 CHEVROLET SILVERADO. WHILE DRIVING APPROXIMATELY 58 MPH, THE CONTACT SLID ON A PATCH OF ICE AND LOST CONTROL OF THE VEHICLE. THE VEHICLE RAN OFF THE ROAD AND CRASHED INTO A TELEPHONE POLL ON THE PASSENGER SIDE. THE VEHICLE STOPPED WHEN IT CRASHED INTO A FROZEN EMBANKMENT. UPON IMPACT, THE FRONT AIR BAGS FAILED TO DEPLOY EVEN THOUGH THE CONTACT MADE IMPACT WITH THE STEERING WHEEL. THE CONTACT WAS INJURED. THE VEHICLE WAS COMPLETELY DESTROYED AND A POLICE REPORT WAS FILED. THE CONTACT FILED A COMPLAINT WITH THE MANUFACTURER, BUT THE COMPLAINT WAS DENIED. THE MANUFACTURER WAS UNABLE TO DIAGNOSE THE VEHICLE; HOWEVER, AFTER INSPECTION OF THE VEHICLE, THE MANUFACTURER CONFIRMED THAT THE AIR BAGS WERE ENABLED AT THE TIME OF IMPACT. THEY DID NOT GIVE AN EXPLANATION FOR THE DEPLOYMENT FAILURE. THE VIN WAS UNKNOWN. THE FAILURE AND CURRENT MILEAGES WERE 180,000. UPDATED 09/03/08 *BF UPDATED 09/04/08. *JB
10115547	CHEVROLET	SUBURBAN	2004	2004-08-03	THE CONSUMER WAS INVOLVED IN AN ACCIDENT IN HIS 2004 CHEVROLET SUBURBAN IN WHICH THE AIR BAGS DID NOT DEPLOY. AN OCCUPANT IN THE VEHICLE WAS INJURED WHEN THE AIR BAGS DID NOT DEPLOY. *NM *SC *JB
10125146	CHEVROLET	SUBURBAN	2004	2005-06-10	DT: VEHICLE WAS GOING ABOUT 35-40 MPH AND THE SIDE AND FRONT AIR BAGS DID NOT DEPLOY DURING AN ACCIDENT. *AK
10200729	CHEVROLET	TAHOE	2004	2007-08-09	I WAS INVOLVED IN A HEAD ON COLLISION WITH 2 OTHER VEHICLES, AT 45 TO 50 MPH, AND MY AIR BAGS FAILED TO DEPLOY. *TR
10409000	CHEVROLET	TAHOE	2004	2011-06-16	2004 CHEVROLET TAHOE, AFTER BEING INVOLVED IN AN ACCIDENT WITH SEVERE IMPACT TO BOTH FRONT CORNERS AND BUMPER, HARD IMPACT COLLISION, AND AFTER FLIPPING THREE TIMES, BOTH FRONT AIR BAGS DID NOT DEPLOY. SEVERE DRIVER INJURY AS A RESULT OF THE AIRBAG FAILURE. *TR
10836861	CHEVROLET	TAHOE	2004	2015-02-09	MY HUSBAND AND I WAS INVOLVED IN AN ACCIDENT AND THE AIR BAGS DID NOT DEPLOY WE WERE HIT AT 55 MPH
10314549	CHEVROLET	TRACKER	2004	2010-02-04	MYSELF AND 2 DAUGHTERS WERE IN A HEAD ON WRECK 2/04/2010 WHEN A GUY PULLED OUT IN FRONT OF US, NEITHER OF THE AIRBAGS DEPLOYED. MY DAUGHTER HIT THE WINDSHIELD AND I HIT THE STEERING WHEEL AND DASH. THE PREGNANT ONE WAS THANKFULLY IN THE BACK SEAT. *TR
10567426	CHEVROLET	TRACKER	2004	2014-02-23	TL* THE CONTACT OWNS A 2004 CHEVROLET TRACKER. THE CONTACT STATED THAT WHILE DRIVING IN THE SNOW, SHE LOST CONTROL OF THE VEHICLE AND CRASHED THE FRONT OF END INTO AN EMBANKMENT. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUFFERED CONTUSIONS AND BRUISING TO THE TORSO REGION. A POLICE REPORT WAS TAKEN. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS APPROXIMATELY 20,000. UPDATED 04/22/14*LJ THE CONSUMER STATED SHE HIT A PATCH OF ICE WHILE DRIVING, SHE VEERED OFF THE HIGHWAY LOST CONTROL OF THE VEHICLE, AND FLIPPED OVER 3 TIMES. UPDATE 04/24/14
10083860	CHEVROLET	TRAILBLAZER	2004	2004-07-16	WHILE DRIVING AT 70 MPH DRIVER SWERVED TO LEFT TO AVOID HITTING A MOTORIST. WHEN THE DRIVER ATTEMPTED TO STRAIGHTEN BACK THE STEERING WHEEL BY TURNING IT TO THE RIGHT IT OVERCORRECTED SEVERELY. THIS RESULTED IN THE DRIVER LOSING CONTROL OF THE VEHICLE AND CRASHING INTO A TREE. UPONIMPACT, AIR BAGS DID NOT DEPLOY. DRIVER DIED, AND FRONT PASSENGER SUSTAINED A BROKEN NECK, SEVERE LACERATION TO THEIR SCULL, AND BRUISES. THE PASSENGER IN THE REAR SUSTAINED A BROKEN ANGLE , A DISLOCATED HIP, AND TWO BROKEN RIBS. *AK
10087212	CHEVROLET	TRAILBLAZER	2004	2004-08-03	WHILE DRIVING 45 MPH CONSUMER'S VEHICLE COLLIDED INTO ANOTHER VEHICLE. UPON IMPACT, BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. VEHICLE WAS TOWED TO A GARAGE. *AK THE CONSUMER SUSTAINED A HAIR LINE FRACTURE IN THE CHEST AREA. *NM
10094926	CHEVROLET	TRAILBLAZER	2004	2004-10-03	AT APPROXIMATELY 45 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A COLLISION, STRIKING A BARRIER HEAD ON. UPON IMPACT, AIR BAGS DID NOT DEPLOY.*AK
10100282	CHEVROLET	TRAILBLAZER	2004	2004-10-29	I WAS GOING BETWEEN 25 AND 35 MPH I SWERVED TO AVOID A VEHICLE BACKING UP THAT HAD MISSED A TURN. I TRIED TO STREER BACK AND LOST CONTROL HITTING A TELEPHONE POLE HEAD ON. AIRBAGS DID NOT DEPLOY NEITHER DID ONSTAR. TO THIS POINT NOTHING HAS BEEN DONE TO REPAIR THE FAILURE AS FOR MY DAD'S TRAILBLAZER THATS A WORK IN PROGRESS. *AK
10103148	CHEVROLET	TRAILBLAZER	2004	2004-11-24	CONSUMER WAS DRIVING 60 MPH AND LOST CONTROL, HITTING A UTILITY POLE. UPON IMPACT, THE AIRBAGS FAILED TO DEPLOY. VEHICLE WAS TOTALED. *AK
10106552	CHEVROLET	TRAILBLAZER	2004	2004-12-29	I WAS DRIVING A CHEVY TRAILBLAZER RENTED FROM HERTZ ON DECEMBER 29, 2004. ON HIGHWAY 285 NEAR MILE MARKER 189.5, I ENCOUNTERED BLACK ICE ON A CURVE. THE VEHICLE STARTED A 4-WHEEL DRIFT INTO THE ONCOMING LANE. I ATTEMPTED TO AVOID COLLIDING WITH ANOTHER VEHICLE THAT HAD SPUN OUT. THE ABS DID NOT WORK. THERE WAS NO STABILITY CONTROL. I STRUCK AN EMBANKMENT AND THE VEHICLE FLIPPED OVER. ALTHOUGH THERE WAS BOTH FRONTAL AND SIDE IMPACT, NO AIRBAGS DEPLOYED. IT IS MY BELIEF THAT THE CHEVY TRAILBLAZER IS INHERENTLY UNSAFE. THERE IS NO WAY THIS VEHICLE SHOULD HAVE ROLLED OVER AT THE SPEED AT WHICH I WAS DRIVING. *NM
10123920	CHEVROLET	TRAILBLAZER	2004	2005-05-30	OTHER VEHICLE FAILED TO YIELD FROM A YIELD SIGN. FRONT OF TRAILBLAZER STRUCK RIGHT SIDE REAR OF OTHER VEHICLE. IMPACT DAMAGED CROSS BAR ON FRAME PUSHING RADIATOR INTO MOTOR. DRIVER AND PASSENGER AIR BAG FAILED TO DEPLOY. ESTIMATED IMPACT SPEED 45-50

10135169	CHEVROLET	TRAILBLAZER	2004	2005-01-19	MY DAUGHTER WAS DRIVING MY 2004 TRAILBLAZER ON AN ICY, SLIPPERY ROAD AT 25 -30 MILES PER HOUR, (THE SPEED LIMIT IS 30, IT WAS THE STREET WE LIVE ON) WHEN SHE LOST CONTROL, HIT A TREE AND TOTALED (\$22,000.00) THE VEHICLE. THE OFFICER AND I WALKED THE PATH IN THE STREET AND COULD NOT FIND ANY SIGNS OF SKIDDING OR BRAKING, THEREFORE LEADING ME TO BELIEVE NOW THAT THERE WAS A BRAKING FAILURE. UP UNTIL NOW, WHEN I HEARD ABOUT THE BRAKES FAILING DO TO CORROSION FROM ROAD SALT, I ALWAYS THOUGHT IT WAS JUST AN ACCIDENT IN POOR ROAD CONDITIONS. WHEN I FIRST READ THE REPORT OF THE INVESTIGATION I COULDN'T BELIEVE IT WAS THE SAME SCENARIO AS HER ACCIDENT. POOR ROAD CONDITIONS, THEREFORE POSSIBLE SALT BUILDUP, A SLOW SPEED AND INABILITY TO STOP. I AM SO GRATEFUL THAT SHE WALKED AWAY WITHOUT A SCRATCH, ALSO CONSIDERING THE AIR BAGS DID NOT DEPLOY, EVEN THOUGH THE FRONT END WAS TOTALED. I AM SURE THIS IS A PROBLEM THAT MUST BE IDENTIFIED FOR THOSE LIVING IN COLDER, NORTHERN STATES.
10154051	CHEVROLET	TRAILBLAZER	2004	2005-10-23	FOIA REQUEST ALL DOCUMENTS/INFO RELATIVE TO ANY RECALLS OR KNOWN DEFECTS OF THE AIR BAG SYSTEM IN THE 2004 CHEVROLET TRAILBLAZER. *TS ATTORNEY'S CLIENTS WERE SERIOUSLY INJURED WHEN THE VEHICLE THEY WERE OPERATING WAS INVOLVED IN A HIGH SPEED, FRONT END COLLISION. THE AIR BAG SYSTEM DID NOT DEPLOY AT THE TIME OF IMPACT AND AS A RESULT THE THREE OCCUPANTS WERE INJURED. *NM ***NAR***
10158090	CHEVROLET	TRAILBLAZER	2004	2006-02-26	DT*: THE CONTACT STATED WHILE DRIVING 50 MPH THE VEHICLE WAS INVOLVED IN A HEAD ON COLLISION WITH ANOTHER VEHICLE. THE VEHICLE CONTINUED MOVING AND STOPPED BY COLLIDING WITH A STORE SIGN. THE AIR BAGS DID NOT DEPLOY AND SEAT BELTS WERE WORN. THERE WERE NO WARNING LIGHTS TO INDICATE THE AIR BAGS WOULD FAIL. THE CONTACT SUFFERED A KNEE INJURY. A POLICE REPORT WAS FILED AT THE SCENE. THE INSURANCE COMPANY DETERMINED THE VEHICLE WAS TOTALED DUE TO THE ACCIDENT. THE DEALER DOES NOT HAVE THE MEANS TO TEST FOR AIR BAG NON-DEPLOYMENT. UPDATED 1/24/2007 - *NM
10177618	CHEVROLET	TRAILBLAZER	2004	2006-12-01	TL* - THE CONTACT OWNS A 2005 CHEVROLET TRAIL BLAZER. DURING A SNOW STORM THE CONTACT'S VEHICLE WAS INVOLVED IN A HEAD ON COLLISION. THE CONTACT WAS DRIVING ON THE HIGHWAY AT 55 MPH, AND THE AIR BAGS DID NOT DEPLOY. THERE WERE NO WARNING INDICATOR LIGHTS. THE MANUFACTURER SENT AN INVESTIGATOR TO ACCESS THE DAMAGE, AND STATED THAT THERE WAS \$10,000 WORTH OF DAMAGE, AND THAT THE VEHICLE WAS ONLY TRAVELING 8 MPH. *AK
10178863	CHEVROLET	TRAILBLAZER	2004	2007-01-13	TL* - THE CONTACT STATED THAT ON 1/13/07 HE CRASHED INTO ANOTHER VEHICLE WITH HIS 2004 CHEVROLET TRAILBLAZER. THE ODOMETER READ 33,000 MILES AT THE TIME OF THE CRASH. HE WAS DRIVING AT 45 MPH AND COLLIDED WITH THE SECOND VEHICLE IN A PERPENDICULAR ANGLE "T-BONE" STRIKING IT ON THE SIDE AS IT CROSSED IN FRONT OF HIM. THE DRIVER WAS THE ONLY OCCUPANT IN THE VEHICLE AND THE DRIVER'S SIDE AIRBAG NEVER DEPLOYED. THERE WERE 5 PEOPLE INJURED IN THE SECOND VEHICLE. *NM
10218896	CHEVROLET	TRAILBLAZER	2004	2008-02-22	TL*THE CONTACT OWNS A 2004 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 35 MPH, THE CONTACT REAR ENDED A SCHOOL BUS. THE VEHICLE WAS COMPLETELY DESTROYED AND NONE OF THE AIR BAGS DEPLOYED. TWO PASSENGERS WERE INJURED AND A POLICE REPORT WAS FILED. PRIOR TO THE FAILURE, SHE NEVER EXPERIENCED ANY AIR BAG FAILURE. THE DEALER AND MANUFACTURER HAVE NOT BEEN NOTIFIED. THE CONTACT HAS PICTURES. THE VIN AND ENGINE SIZE WERE UNKNOWN. THE CURRENT AND FAILURE MILEAGES WERE 44,000.
10228023	CHEVROLET	TRAILBLAZER	2004	2006-11-06	I WAS SIDE SWIPED BY ANOTHER CAR THAT WENT THROUGH A RED LIGHT. MY TRUCK THEN PROCEEDED TO HIT ANOTHER CAR AND FINALLY THE FRONT END OF THE TRUCK GOT AIRBORNE AND LANDED WITH THE TIRES IN THE FRONT WINDSHIELD OF ANOTHER CAR. THE TRUCK SUSTAINED OVER \$6,000 IN DAMAGE AS WELL AS THE FRONT FRAME WHERE THE MOTOR SITS WAS DAMAGED. INSURANCE COMPANY SAID IT COULD BE REPLACED. NOT SURE HOW BECAUSE IT WAS WELDED IN PLACE. AND MY AIRBAGS NEVER DEPLOYED. *TR
10228026	CHEVROLET	TRAILBLAZER	2004	2007-03-07	I WAS REAR ENDED BY A GUY DOING 40 MPH. MY TRUCK WAS LIFTED IN THE AIR AND PUSHED INTO THE REAR END OF ANOTHER VEHICLE. MY AIRBAGS NEVER DEPLOYED AND MY SEAT BROKE!! POSSIBLE DEFECT IN THE SEAT? I WAS STOPPED AT A RED LIGHT WHEN THE ACCIDENT HAPPENED. THE SPARE TIRE HOLDER WAS RIPPED OFF MY TRUCK. *TR
10240623	CHEVROLET	TRAILBLAZER	2004	2008-08-26	SLIGHTLY TURNED STEERING WHEEL TO LEFT TO AVOID ANOTHER MOTORIST IN FRONT OF ME. ATTEMPTED TO STRAIGHTEN OUT THE VEHICLE, VEHICLE OVER-CORRECTED SEVERELY, UNABLE TO BRAKE, VEHICLE SLAMMED HEAD-ON INTO CONCRETE HIGHWAY BARRIER 45-60MPH, AIR BAGS FAILED TO DEPLOY. DRIVER WAS WEARING SEATBELT, SUBSTANTIAL BRUISING & NECK/BACK INJURY. *TR
10313103	CHEVROLET	TRAILBLAZER	2004	2009-10-02	TL*THE CONTACT OWNS A 2004 CHEVROLET TRAILBLAZER. WHILE THE CONTACT WAS DRIVING 35 MPH HE CRASHED INTO ANOTHER VEHICLE AND THEN INTO A LIGHT POLE WHICH DESTROYED THE VEHICLE; HOWEVER, DURING THE CRASH NONE OF THE AIR BAGS DEPLOYED. THE DRIVER AND PASSENGER WERE INJURED. NO ONE WAS INJURED IN THE OTHER VEHICLE. THE VEHICLE WAS DIAGNOSED BY THE DEALERSHIP WHO STATED THAT NO FAILURES COULD BE FOUND. THERE WERE NO PRIOR WARNINGS. THE CURRENT AND FAILURE MILEAGES WERE 95,272 UPDATED 03/30/10. *LJ ACCORDING TO GM, THE NOTICE ON THE DASH READOUT STATED THE AIR BAGS DEPLOYED. UPDATED 06/30/10. *JB

10327766	CHEVROLET	TRAILBLAZER	2004	2010-04-21	TL* THE CONTACT OWNS A 2004 CHEVROLET TRAILBLAZER. WHILE DRIVING 35 MPH, THE CONTACT ATTEMPTED TO MANEUVER THE STEERING WHEEL TO AVOID CRASHING INTO A DEER AND LOST CONTROL OF THE VEHICLE. THE VEHICLE CRASHED INTO A TREE. THE AIR BAGS DID NOT DEPLOY UPON IMPACT. THE CONTACTS FACE HIT THE STEERING WHEEL UPON IMPACT AND SUSTAINED A BROKEN NOSE. THE CONTACT WAS TAKEN TO THE HOSPITAL. THE VEHICLE WAS DESTROYED AND WAS TOWED BY HER INSURANCE COMPANY TO AN UNKNOWN LOCATION. A POLICE REPORT WAS AVAILABLE, IF NEEDED. THE MANUFACTURER WAS NOT CONTACTED. THE FAILURE MILEAGE WAS 80,700.
10356973	CHEVROLET	TRAILBLAZER	2004	2010-09-19	TL* THE CONTACT OWNED A 2004 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT THE AIRBAGS DID NOT DEPLOY WHEN HIS WIFE CRASHED INTO A DEER AT APPROXIMATELY 35 MPH. THE DRIVER WAS ALSO INVOLVED IN ANOTHER CRASH WHEN TRAVELING APPROXIMATELY 55 MPH. SHE LOOKED DOWN TO CHECK ON A NOISE SHE HEARD AND WHEN SHE LOOKED UP THE THE VEHICLE LOST CONTROL AND CRASHED HEAD ON INTO A TREE. THE DRIVER AND THREE OTHER OCCUPANTS WERE INURED. THE GEORGIA HIGHWAY PATROL RESPONDED AND FILED A REPORT. THE PARAMEDICS ALSO RESPONDED AND TRANSPORTED THE FOUR OCCUPANTS TO THE HOSPITAL. THE VEHICLE WAS DESTROYED AND TOWED TO A STORAGE LOT. THE FAILURE MILEAGE WAS APPROXIMATELY 107,000.
10419650	CHEVROLET	TRAILBLAZER	2004	2011-08-13	I HIT A DEER AT APPROXIMATELY 65 MPH AND THE AIR BAG DID NOT DEPLOY. MY SON THAT WAS RIDING IN THE PASSENGER SEAT ALSO WAS WEARING HIS SEAT BELT BUT THE SEAT BELT DID NOT CATCH AND HE WAS SLAMMED INTO THE DASH. I REFUSE TO BELIEVE THAT THIS IS NORMAL BEHAVIOR FOR THOSE SAFETY DEVICES. *KB
10551484	CHEVROLET	TRAILBLAZER	2004	2013-10-29	TL* THE CONTACT OWNS A 2004 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING 35 MPH, THE DRIVER BECAME DISTRACTED AND CRASHED INTO A TREE. THE AIR BAGS FAILED TO DEPLOY AND THE SEAT BELT FAILED TO RESTRAIN, CAUSING THE DRIVER TO BE THROWN FORWARD. THE DRIVER'S HEAD IMPACTED THE WINDSHIELD AND AS A RESULT, HE SUSTAINED BLEEDING FROM THE BRAIN. A POLICE REPORT WAS FILED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS DESTROYED. THE VIN WAS NOT AVAILABLE. THE FAILURE AND CURRENT MILEAGE WAS UNKNOWN. THE VIN WAS NOT AVAILABLE.
10576838	CHEVROLET	TRAILBLAZER	2004	2008-06-16	ON THE AFTERNOON OF 6/16/08, ME IN MY FAMILY WAS TRAVELING NORTH ON I95 IN NORTH CAROLINA GOING TOWARD OUR DESTINATION IN BALTIMORE MD., WHEN ANOTHER VEHICLE CLICK US AND CAUSE MY SISTER TO LOSE CONTROL OF THE VEHICLE CRASHING INTO THE GUARDRAIL. MY TWO AUNTS AND MYSELF WERE EJECTED FROM THE VEHICLE, BOTH MY AUNTS DIE INSTANTLY. MY MOTHER, SISTERS AND MYSELF SURVIVED BUT HAD SEVERAL INJURIES. THE AIRBAGS DID NOT DEPLOY, AND THE DOORS THAT WERE INITIALLY LOCKED; BUT SOMEHOW THE REAR DOORS (MIDDLE) OPEN DURING IMPACT CAUSING MY AUNTS IN MYSELF TO BE THROWN FROM THE VEHICLE. BE ADVISED THE VEHICLE WAS A GREEN TRAILBLAZER (EXTENDED CAB). *TR
10626582	CHEVROLET	TRAILBLAZER	2004	2014-08-18	I WAS ON A 4 LANE HIGHWAY TRAVELING EASTBOUND GOING 50 MPH POSTED SPEED 55 MPH WEARING OUR SEAT BELTS, WHEN ANOTHER VEHICLE WAITING TO U - TURN IN THE CENTER MEDIAN DECIDED TO TURN RIGHT INTO ME-ONCOMING TRAFFIC. THIS PERSON COLLIDED WITH ME, WHICH THAT IMPACT SENT ME INTO A HEAD ON COLLISION WITH THE GUARD RAIL. THE CHEVROLET TRAILBLAZER IS COMPLETELY TOTALED. THERE WERE 2 INCIDENTS IN THAT SEQUENCE OF EVENTS THAT THE AIRBAGS SHOULD HAVE DEPLOYED, BUT DID NOT! THIS ACCIDENT CAUSED SEVERAL INJURIES TO MYSELF AND MY PASSENGER. WE DEFINITELY COULD HAVE BEEN KILLED AND NO AIRBAGS TO HELP SAVE OUR LIVES.....UPDATED 09-03-14 *BF UPDATED 11/7/2014 *JS *TR
10767586	CHEVROLET	TRAILBLAZER	2004	2015-08-01	ON SATURDAY, AUGUST 1, 2015 AT APPROXIMATELY 8:55PM MY MOTHER WAS INVOLVED IN A 1 CAR ACCIDENT ON BAUM RD LOCATED IN TALLAHASSEE, FL. SHE WAS THE ONLY PASSENGER DETERMINED TO BE IN THE VEHICLE AT THE TIME OF THE ACCIDENT. ACCORDING TO THE CRASH REPORT, D1 (DRIVER ONE) WAS TRAVELING WESTBOUND ON BAUM RD GOING THE NORMAL POSTED SPEED OF 55MPH, WHEN SHE VEERED TOWARDS THE CENTER OF THE RD AND SUDDENLY TURNED RIGHT VEERING OF THE RIGHT SHOULDER OF THE RD AND STRIKING SEVERAL TREES ON THE DRIVERS SIDE AND FRONT END. D1 WAS WEARING HER SEATBELT AND MANAGED TO EXIT OUT THE DRIVERS SIDE WINDOW BEFORE COMING TO HER FINAL RESTING PLACE ON THE SHOULDER OF THE RD. WHEN I WENT TO RETRIEVE MY MOTHERS THINGS FROM HER TRAILBLAZER, I NOTICED THAT NO AIR BAGS HAD DEPLOYED. AND AS FAST AS MY MOM WAS GOING AND THE TYPE OF IMPACT & DAMAGE HER SUV SUSTAINED, I WOULD THINK AND HOPE THE AIRBAGS WOULD DEPLOY IN THIS TYPE OF ACCIDENT, THUS PREVENTING SERIOUS INJURY OR DEATH. MY MOM WAS NOT SO LUCKY, AND MYSELF AND MY FAMILY HAVE ENDURED GREAT PAIN FROM LOOSING HER SO SUDDENLY.
10823597	CHEVROLET	TRAILBLAZER	2004	2016-01-19	I WAS RECENTLY IN A CAR ACCIDENT DUE TO BAD WEATHER AND ROAD CONDITIONS. LEAVING WORK DRIVING INTERSTATE I89 9STATE NORTHBOUND. CAME UPON BLACK ICE MY CAR FISHTAILED OUT OF CONTROL ; TRYING TO GAIN CONTROL BACK BEFORE I KNEW IT I WAS HEADING TORDS A GUARD RAIL. I WAS ONLY DRIVING 50 TO 55MPH. BEYOND THE GUARD RAIL I DO NOT REMEMBER. I SUFFERED UPPERBODY AND HEAD INJURY AND MY FRONT AIR BAG FAILED TO DEPLOY. OTHERS ARE TELLING ME AND MY HUSBAND TO LOOK INTO THIS AS MY AIRBAG FAILED TO DEPLOY. CAN YOU HELP
11265285	CHEVROLET	TRAILBLAZER	2004	2019-09-29	WELL I HIT A TREE AN THE AIRBAGS DIDNT DEPLOYED BUT THE AIRBAG LIGHT IS ON

10128270	GMC	ENVOY	2004	2005-07-08	DT: CONSUMER STATES THAT SHE WAS IN A HEAD ON COLLISION ON JULY 8, 2005 AND THE AIR BAGS DID NOT DEPLOY. SHE WAS GOING 55 MPH WHEN HIT. THERE WAS DAMAGE TO THE VEHICLE AND A POLICE REPORT WAS TAKEN. CONSUMER STATES SHE HAS NECK AND BACK INJURIES, SHE IS GOING TO THE DOCTOR FOR A FOLLOW UP VISIT TODAY. HER DAUGHTER HAS SEAT BELT BURNS ON HER NECK. THE VEHICLE IS CURRENTLY BEING INSPECTED BY THE INSURANCE COMPANY; IT HAD TO BE TOWED TO A BODY SHOP. SHE HAS NOT CONTACTED THE DEALERSHIP OR MANUFACTURER, THE ATTORNEY GENERAL ADVISED HER TO CALL US FIRST. *NM
10152802	GMC	ENVOY	2004	2006-03-13	AVOIDING TO HIT AN UPCOMING VEHICLE IN A CURVE, I LOST CONTROL OF MY GMC ENVOY SUV 2004 AND HIT A CONCRETE DRIVEWAY AND STOPPED WITH AN ELECTRICAL UTILITY POST FRONT SIDE. THE AIRBAGS DID NOT DEPLOY CAUSING MYSELF TO HIT THE STEERING WHEEL AND INJURED MY NECK, MY HEAD, LOWER BACK, KNEES AND LEFT ARM. THE INSURANCE COMPANY TOLD ME THAT IF THE AIR BAGS WOULD DEPLOYED THEY WOULD DECLARED MY VEHICLE TOTAL LOSS DUE TO THE EXTENSIVE DAMAGE. I TOLD THEM I DON'T WANT MY VEHICLE REPAIRED IF THE AIR BAGS ARE NOT CHANGED. I INTEND TO GO AGAINST GMC LEGALLY. *JB
10182098	GMC	ENVOY	2004	2007-01-03	IN ROUTE TO WORK DRIVING MY 2004 GMC ENVOY I WAS INVOLVED IN WHAT I WOULD CONSIDERED A HEAD ON COLLISION WITH A TELEPHONE POLE. THE IMPACT WAS GREAT ENOUGH TO SPILT THE POLE IN TWO, TOP HALF JUST MISSING THE ROOF OF THE VEHICLE . UPON IMPACT THE AIRBAGS DID NOT DEPLOY NOR DID MY SEAT BELTS LOCK ME IN CAUSING ME TO FLY FORWARD HITTING MY HEAD ON THE STEERING WHEEL, I HAD TO BE EXTRACTED FROM VEHICLE BY FIRE DEPARTMENT AND TRANSPORTED TO ER. I NOW HAVE PERMANENT SCAR APPROXIMATELY 5 INCHES IN LENGTH ACROSS MY FOREHEAD. I FILED A COMPLAINT WITH GMC LATER TO BE INFORMED THAT AFTER THEIR INVESTIGATION THEY CONCLUDED THAT SINCE THE PASSENGER SIDE TOOK THE GREATER OF THE IMPACT THE IMPACT WAS NOT GREAT ENOUGH TO WARRANT AIRBAG DEPLOYMENT. PLEASE NOTE THAT DRIVERS NOR PASSENGER SIDE AIRBAG DEPLOYED. *JB
10237647	GMC	ENVOY	2004	2008-08-10	TL*THE CONTACT OWNS A 2004 GMC ENVOY. WHILE DRIVING APPROXIMATELY 55 MPH, THE VEHICLE STRUCK A GATE, WENT AIRBORNE, DROPPED APPROXIMATELY 35 FEET DOWN AN EMBANKMENT, STRUCK SOME TREES, BOULDERS, AND LANDED IN A SWAMP. THE AIR BAGS FAILED TO DEPLOY AND THE VEHICLE SUSTAINED MAJOR DAMAGE. BOTH THE DRIVER AND PASSENGER SUSTAINED MULTIPLE INJURIES. THE VEHICLE HAD TO BE LIFTED FROM THE EMBANKMENT WITH A CRANE AND WAS TOWED AWAY. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE 51,000.
10266307	GMC	ENVOY	2004	2009-04-20	I WAS TRAVELING NORTHBOUND ON RT 251 FROM PERU TO MENDOTA IL WHEN IT BEGAN RAINING AND HAILING VERY HARD. 251 IS FULL OF POT HOLES. I WAS TRAVELING ABOUT 40 M.P.H. I HIT A POT HOLE AND MY CAR STARTED TO HYDROPLAN. I WENT INTO THE SOUTHBOUND LANE AND THEN INTO DITCH HEAD ON....I HIT THE DITCHES WALL ALMOST HEAD ON AND MY AIRBAGS DID NOT COME OUT. *TR
10272370	GMC	ENVOY	2004	2009-05-02	TL*THE CONTACT OWNS A 2004 GMC ENVOY. WHILE DRIVING 60 MPH WITH THE CRUISE CONTROL ACTIVATED, THE CONTACT PASSED OUT DUE TO A SEVERE MEDICAL ISSUE . HE LOST CONTROL OF THE VEHICLE AND CRASHED INTO A TREE. UPON IMPACT, BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. THE CONTACT AND PASSENGER WERE SEVERELY INJURED. THE DRIVER SUSTAINED A BROKEN CLAVICLE AND HIS TEETH WERE KNOCKED OUT OF HIS MOUTH. THE PASSENGER SUSTAINED A LACERATION TO THE HEAD AND ABDOMINAL INJURIES. THE VEHICLE WAS INSPECTED BY AN INSURANCE ADJUSTER, WHO WAS UNABLE TO DETERMINE WHY THE AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS DESTROYED. THE CONTACT CALLED THE MANUFACTURER AND WAS INFORMED THAT AN INVESTIGATION WAS IMPLEMENTED AND A REPRESENTATIVE WILL CALL HIM BACK IN FIVE BUSINESS DAYS. THE FAILURE MILEAGE WAS 42,600. UPDATED 6/5/09 *CN UPDATED 06/09/09.*JB
10275464	GMC	ENVOY	2004	2009-06-29	TL*THE CONTACT OWNS A 2004 GMC ENVOY. WHILE DRIVING 35 MPH, THE CONTACT REAR ENDED ANOTHER VEHICLE. HIS VEHICLE WAS DESTROYED. THE AIR BAGS FAILED TO DEPLOY AND THE SEAT BELTS DID NOT RETRACT FOR BOTH OCCUPANTS SEATED IN THE FRONT. THE CONTACT AND THE PASSENGER STRUCK THE STEERING WHEEL WITH THEIR CHESTS AND SHOULDERS. BOTH WERE SEVERELY INJURED. THE CONTACT, PASSENGER, AND OTHER DRIVER WERE TRANSPORTED TO THE HOSPITAL. THE VEHICLE WAS TOWED TO A REPAIR SHOP AND IS AWAITING AN INVESTIGATION. A POLICE REPORT WAS FILED. THE FAILURE MILEAGE WAS 60,000.
10286793	GMC	ENVOY	2004	2009-10-07	WHILE TRAVELING DOWN I-95 AT APPX. 60MPH THE CAR IN FRONT OF ME STOPPED SHORT. I SLAMMED INTO THE BACK OF IT. MY AIRBAGS DID NOT DEPLOY, NOR DID ONSTAR CALL TO CHECK ON ME (SO MUCH FOR BELIEVING IN THOSE ADS!) THE ENTIRE FRONT END NEEDS TO BE REPLACED. FLUIDS WERE SPILLING FROM THE VEHICLE. 2 WITNESSES ARE CAPITOL HILL POLICE OFFICERS WHO WERE SHOCKED THAT THE AIRBAGS DID NOT DEPLOY. THE SEATBELT DID RESTRAIN ME CAUSING IRRITATION AT THAT SITE. MY BACK, NECK AND HEAD WERE ACHING. I WAS CHECKED OUT BY THE ER. *TR
10302345	GMC	ENVOY	2004	2010-01-26	TL*THE CONTACT OWNS A 2004 GMC ENVOY. WHILE DRIVING 65 MPH IN SNOWY CONDITIONS, HE ATTEMPTED TO PASS A VEHICLE AND WHILE RETURNING BACK INTO THE LANE THE VEHICLE SLID AND HE CRASHED INTO A CONCRETE BARRIER FRONT-END FIRST. THE FRONTAL AIR BAGS DID NOT DEPLOY AT THE TIME OF THE CRASH. THE CONTACT DID NOT SUFFER ANY INJURIES. THE POLICE ARRIVED SHORTLY AFTER AND A POLICE REPORT WAS FILED. THE FAILURE AND CURRENT MILEAGES WERE UNDER 97,000.

10594270	GMC	ENVOY	2004	2014-03-12	CAR SLID INTO RIGHT GUARDRAIL AND THEN SLID TO LEFT IN DITCH ON EXPRESSWAY. THE AIRBAGS DID NOT DEPLOY. IMPACT WAS SIGNIFICANT ENOUGH TO BEND THE FRONT PASSENGER CORNER OF FRAME. THE FRAME IS ALSO CRACKED UNDERNEATH THE MIDDLE OF VEHICLE AS RESULT OF CRASH. CAR IS NO LONGER DRIVEABLE. DRIVER SUFFERED WHIPLASH. *TR
10596479	GMC	ENVOY	2004	2014-03-31	I HAD AN ACCIDENT ON A MAJOR HIGHWAY DUE TO WEATHER CONDITIONS. I ENDED UP SPINNING THE VEHICLE AROUND WHILE IN THE TRAVEL LANE AND HIT THE CAR IN THE PASSING LANE. MY AIRBAGS NEVER DEPLOYED. ALTHOUGH NO ONE WAS INJURED THANKFULLY. I WONDERED WHY THE AIRBAGS DIDN'T GO OFF. SHOULD I BE WORRIED? HAS ANYONE MADE THIS SAME COMPLAINT? THANK YOU. *TR
10631914	GMC	ENVOY	2004	2009-08-25	MY WIFE WAS IN THE CAR ALONE. VEHICLE RAN OFF ROAD, CRASHED INTO PARKED TRUCK, AIR BAG DID NOT DEPLOY. WIFE DIED OF "CLOSED CHEST TRAUMA", *TR
11378518	GMC	ENVOY	2004	2020-12-03	TL-THE CONTACT OWNS A 2004 GMC ENVOY. THE CONTACT STATED THAT WHILE DRIVING AT 50 MPH HE HAD THE SWERVE TO AVOID A HEADON COLLISION FROM A VEHICLE THAT WAS IN HIS LANE. THE VEHICLE WENT OFF THE ROAD AND CRASHED INTO A CONCRETE BARRIER.THE CONTACT HAD A FRACTURED STERNUM AND A BRUISED RIGHT ANKLE, KNEE AND ELBOW. THE CONTACT VISITED THE EMERGENCY ROOM ON HIS OWN WITHOUT BEING TRANSPORTED BY AN AMBULANCE.THE CONTACT STATED THAT NONE OF THE AIR BAGS IN THE FRONT DEPLOYED. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED BY THE INSURANCE COMPANY AND TOWED FROM THE CRASH SITE. THE ENTIRE FRONT OF THE VEHICLE WAS SMASHED IN INCLUDING THE FRAME. THE BACK AXEL DROPPED AFTER THE COLLISION AND BOTH RIMS ON THE BACK TIRES WERE SHATTERED. THE FRONT RIMS WERE ALSO CRACKED. THE DEALER AND MANUFACTURER HAD NOT BEEN CONTACTED YET. THE FAILURE MILEAGE WAS 180,000. TF
10067417	GMC	YUKON	2004	2004-04-16	WHILE DRIVING CONSUMER APPLIED THE BRAKES AND WITHOUT WARNING CONSUMER'S VEHICLE COLLIDED WITH THE VEHICLE IN FRONT. UPON IMPACT, AIR BAGS DID NOT DEPLOY. DRIVER SUSTAINED MINOR INJURIES AND WAS TRANSPORTED TO THE HOSPITAL FOR EXAMINATION. VEHICLE WAS TOWED TO THE DEALER FOR INSPECTION, AND DEALER WAS UNABLE TO DUPLICATE OR RESOLVE THE PROBLEM. *AK
10372063	GMC	YUKON	2004	2010-11-12	TL* THE CONTACT OWNS A 2004 GMC YUKON. THE CONTACT WAS DRIVING APPROXIMATELY 40 MPH WHEN THE VEHICLE WAS INVOLVED IN A HEAD ON CRASH IN WHICH THE AIR BAGS DID NOT DEPLOY. THE POLICE APPEARED ON THE SCENE AND A REPORT WAS AVAILABLE. THE DRIVER AS WELL AS THE FRONT PASSENGER WAS INJURED AND TRANSPORTED VIA AMBULANCE TO THE HOSPITAL TO TREAT INJURIES. THE VEHICLE WAS TOWED TO AN INSURANCE COMPANY LOT BUT DID NOT HAVE THE FAILURE DIAGNOSED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE AND CURRENT MILEAGE WAS 134,000.
8023949	CHEVROLET	BLAZER	2003	2002-11-19	WHILE TRAVELING AT 40 MPH, CONSUMER STATES ANOTHER VEHICLE TRAVELING IN FRONT CAME TO A SUDDEN STOP. CONSUMER REAR ENDED THAT VEHICLE, AND NONE OF CONSUMER AIRBAGS DEPLOYED. PLEASE PROVIDE ANY FURTHER INFORMATION. PH
10023373	CHEVROLET	BLAZER	2003	2003-06-11	TWO EMPLOYEES WERE INVOLVED IN A CRASH WHERE THEY WERE THE ONES THAT STRUCK A STOPPED CAR AT 50 MPH. THE AIR BAGS DID NOT DEPLOY....IS THIS A PROBLEM. IS THIS A POSSIBLE RECALL SITUATION. WHO DO I CONTACT ABOUT THIS A CHEVROLET??? DOES YOUR AGENCY GET INVOLVED. *NLM
10040503	CHEVROLET	BLAZER	2003		CONSUMER STATED WHILE TRAVELING 45 MPH OR OVER ON WET PAVEMENT VEHICLE LOST CONTROL, AND TRAVELED OFF THE ROAD. REAR HATCH GLASS EXPLODED , BUT AIR BAGS DID NOT DEPLOY AT ANY TIME. *AK
10044264	CHEVROLET	BLAZER	2003	2003-08-30	WHILE TRYING TO AVOID HITTING A PEDESTRIAN VEHICLE WENT OF THE ROAD AND HIT A TREE. UPON IMPACT, FRONT AIR BAGS DID NOT DEPLOY. VEHICLE COULD NO LONGER BE DRIVEN DUE TO THE EXTENSIVE DAMAGE DONE TO THE FRONT END. *AK
10160753	CHEVROLET	BLAZER	2003	2006-06-19	DT*: THE CONTACT STATED THAT BOTH FRONT AIRBAGS OF THE VEHICLE DID NOT DEPLOY DURING A CRASH WHICH OCCURRED WHILE TRAVELING 45 MPH. THE VEHICLE WAS HEADED EAST ON A NARROW, ROUGH, BUMPY ROAD WHEN IT APPROACHED AN INTERSECTION AND STRUCK ANOTHER VEHICLE HEADING NORTH. THE OTHER VEHICLE BRIEFLY STOPPED AT THE STOP SIGN AND PULLED OUT INTO THE INTERSECTION 15 FEET BEFORE THE CONTACT'S VEHICLE REACHED THE INTERSECTION. THIS RESULTED IN THE CONTACT'S VEHICLE CRASHING INTO THE FRONT DRIVER SIDE DOOR OF THE OTHER VEHICLE. BOTH OCCUPANTS WERE WEARING THEIR SEAT BELTS. THE AIRBAG WARNING LIGHT WAS NOT ON PRIOR TO THE CRASH. THE POLICE TOOK PICTURES AND A REPORT WAS FILED. THE VEHICLE WAS TAKEN TO THE DEALER FOR INSPECTION.

					I WAS TRAVELING SOUTHBOUND WHEN I EXPERIENCED A SEIZURE AND LOST CONTROL OF MY VEHICLE. I PROCEEDED TO VEER TO THE LEFT WHERE I CLIPPED SEVERAL CARS THAT WERE HEADED NORTHBOUND AND HAD STOPPED DUE TO THE REALIZATION THAT MY VEHICLE WAS NOT UNDER CONTROL. I THEN PROCEEDED OVER A TREE LAWN AND INTO A PARKING LOT. I HIT A DODGE RAM PICKUP WITH THE RIGHT FRONT CORNER OF MY VEHICLE AND PUSHED THAT VEHICLE INTO ANOTHER PARKED CAR THAT WAS NEXT TO IT. BOTH VEHICLES ENDED UP SIDWAYS AND MY VEHICLE ENDED UP SPUN AROUND 180 DEGREES. AT THIS TIME MY VEHICLE CAME TO A STOP. POLICE WERE CALLED AN PARAMEDICS ARRIVED. THE JAWS OF LIFE WERE USED TO EXTRACT ME FROM MY VEHICLE. I WAS TAKEN TO A LOCAL HOSPITAL WHERE IT WAS DETERMINED THAT I SUFFERED BURST FRACTURES OF L1, L2, AND L3. I ALSO SUFFERED AN EVULSION FRACTURE OF MY LEFT ANKLE. THE POLICE REPORT STATES THAT I WAS TRAVELLING AT A HIGH RATE OF SPEED AND THAT THE VEHICLES WHICH WERE NORTHBOUND WERE JUST CLIPPED. THE AIRBAGS ARE BOTH STILL WITHIN THEIR CASES AS NEITHER DEPLOYED. I WOULD EXPECT THIS OF THE PASSENGER AIRBAG AS THAT SEAT WAS UNOCCUPIED BUT THE DRIVER BAG SHOULD HAVE DEPLOYED. THE INSURANCE INVESTIGATOR EVEN EXPRESSED TO MY WIFE THAT HE WAS SURPRISED THAT THE AIR BAG DID NOT DEPLOY. I WAS HAVING A SEIZURE AND WAS NOT CONSCIOUS SO I CANNOT PROVIDE ANY INFORMATION OTHER THAN WHAT IS IN THE POLICE REPORT. THE REPORT IS #370763 ISSUED BY THE TOWNSHIP OF CLINTON, MICHIGAN. THE VEHICLE IS CURRENTLY LOCATED AT COPARD AUTO SALVAGE, 21000 HAYDEN, WOODHAVEN, MI 48183. THE PHONE NUMBER IS 734-365-0070. IT WILL BE HELD THERE FOR BETWEEN 7 AND 10 DAYS FROM 8/26/2013. THANK YOU *TR
10537593	CHEVROLET	BLAZER	2003	2013-08-13	
11075512	CHEVROLET	BLAZER	2003	2016-02-16	REAR ENDED A STOPPED PICK UP AT 45 MPH AND AIR BAGS DID NOT DEPLOY. IT WAS ON A HIGHWAY WHERE THE SPEED LIMIT IS 55. THE WHOLE FRONT END WAS DAMAGED BUT MOST WAS ON DRIVER SIDE.
8017964	CHEVROLET	SILVERADO	2003		THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT HIGHWAY SPEED. UPON IMPACT THE PASSENGER SIDE AIR BAG DID NOT DEPLOYED. MANUFACTURER HAS BEEN CONTACTED. PLEASE PROVIDE FURTHER INFORMATION.*JB
10030725	CHEVROLET	SILVERADO	2003	2003-07-31	2003 CHEVROLET SILVERADO EXT. CAB 4X4 WITH ONSTAR, WRECKED. HIT TREES. TRUCK TOTALLED, FRONT-END DAMAGE, SIDE AND REAR END DAMAGE. AIR BAG DID NOT INFLATE. ONSTAR DID NOT WORK. *AK
10032581	CHEVROLET	SILVERADO	2003	2003-08-01	AIR BAGS FAILED TO OPEN ON HEAD END COLLISION. SPEED APPROX. 40 MPH. 2003 CHEVY SILVERADO - NEW CONDITION
10050872	CHEVROLET	SILVERADO	2003	2003-10-18	INVOLVED IN A 45 MPH COLLISION WITH ANOTHER VEHICLE. AIRBAGS IN MY 2003 CHEVROLET SILVERADO DID NOT DEPLOY.*AK
10055994	CHEVROLET	SILVERADO	2003	2004-01-24	WHILE DRIVING 25 MPH THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION. UPON IMPACT, THE FRONT AIR BAGS DID NOT DEPLOY. THE DRIVER SUSTAINED NECK AND BACK INJURIES. *AK *SC
10056087	CHEVROLET	SILVERADO	2003	2004-01-24	WHILE DRIVING AT 65 MPH ON THE HIGHWAY, THE DRIVER LOST CONTROL OF THE VEHICLE, RESULTING IN A FRONTAL COLLISION. THE VEHICLE WENT INTO AN EMBANKMENT. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THE DRIVER SUSTAINED INJURIES. *AK BROKEN STERNUM, SPINE AND RIBS. THE CONSUMER WAS WEARING HIS SEAT BELT. THE SDM CRASH DOWN LOAD FROM THE CRASH WAS SENT TO ODI WITH PICTURES OF THE VEHICLE. CW *MR *JB
10066690	CHEVROLET	SILVERADO	2003		WHIEL DRIVING AT 40 MPH VEHICLE WAS HIT HEAD ON AND THE AIR BAGS FAILED TO DEPLOY.*MR

10072429	CHEVROLET	SILVERADO	2003	2003-05-25	AIR BAGS NOT DEPLOYING ON A NEW CHEVY SILVERADO PICK-UP/ FOLLOWING A VEHICLE CRASH. DRIVER WAS INJURED, AND SCARRED. WAS HOSPITLIZED AND STILL HAVING PROBLEMS AND WILL HAVE A LIFETIME SCAR ON FACE AREA. ALSO LEGS AND THIGHS ARE SCARRED. OUR SON WAS TRAVELING AT A HIGH RATE OF SPEED PASSING, LOST CONTROL WENT OFF HIGHWAY HEAD ON INTO DEEP DITCH, FLIPPED OVER, WENT SIDE TO SIDE COMING TO REST SIDEWAYS ON TIRES THAT WERE NOW FLAT AND STILL NO AIRBAG DEPLOYMENT. SENT A COMPLAINT AND PICTURES, POLICE REPORT AND MEDICAL RECORDS TO GM, NO SATISFACTION FROM THERE. WHAT DOES A VEHICLE HAVE TO HAVE DONE TO HAVE AN AIRBAG DEPLOY???? VEHICLE WAS TOTALED. SON IS PERMANLY SCARRED, AND PARENTS HAVE LOST FAITH IN CHEVY TRUCKS, AND AIRBAGS. HIS OLDER BROTHER CO-SIGNED SO HE WOULD HAVE A "NEW, SAFER" VEHICLE AND AM NOW SO VERY UPSET WITH GM AS TO AN EXPLANATION AS TO WHY THESE AIR BAGS DID NOT DEPLOY TO PROTECT OUR SON. THIS VEHICLE (HE WAS SPEEDING PASSING) WENT OFF THE ROAD HEAD ON INTO A DEEP DITCH, OVERTURNED SEVERAL TIMES, HIT SIDE TO SIDE IN DITCH, FLATTENED TIRES AND CAME TO REST ON SHOULDER OF ROAD. NOW HOW MUCH MORE DOES IT TAKE TO DEPLOY AN AIR BAG???? I THINK IF WE WERE WEALTHY AND COULD AFFORD A LAWYER THEY MAYBE WOULD OF LISTENED AND CHECKED THIS MORE, BUT AS WE ARE JUST "COMMON" HARD WORKING US CITIZENS, WE DON'T REALLY COUNT. ALSO OUR SON WAS DRINKING AT THE TIME OF THE INCIDENT, (SHOULD NOT MATTER TO SAFETY OF VEHICLE EQUIPMENT) I WAS TOLD IT WAS NOT "CATASTROPIC ENOUGH" OF AN ACCIDENT TO WARRENT ANY DAMAGES. ?? THEN THEY TRIED TO SAY THE "ACCIDENT" (MEANING VEHICLE) WASN'T. I THINK WE ALL KNOW WHAT THEY MEANT. WE WERE NOT LOOKING FOR "MILLIONS" (STRETCHING IT), JUST HIS MEDICAL BILLS AND THE PROBLEM CORRECTED IN OTHER CHEVY'S SO THIS WOULD NOT HAPPEN TO SOMEONE ELSE. AS USUAL THE HONEST PEOPLE, AND HARD WORKING MIDDLE CLASS CAN GET NO HELP. PRAYERS GO OUT TO ANYONE ELSE THIS HAS HAPPENED TO AND THAT IT WON'T HAPPEN TO SOMEONE ELSE'S CHILD.
10089611	CHEVROLET	SILVERADO	2003	2004-08-14	WHILE DRIVING 55 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A FRONT COLLISION. UPON IMPACT, DUAL AIR BAGS DID NOT DEPLOY. DRIVER SUSTAINED HEAD INJURIES DUE TO HIS HEAD HITTING THE STEERING WHEEL.*AK THE CHEVROLET TESTERS CAME TO INSPECT THE VEHICLE. THEY CONCLUDED THAT THE IMPACT WAS NOT HARD ENOUGH NOR WAS THE VEHICLE GOING FAST ENOUGH FOR THE AIR BAG TO DEPLOY. *NM
10137033	CHEVROLET	SILVERADO	2003	2005-08-14	AIR BAGS DID NOT INFLATE WITH A FRONT END CRASH THAT PUSHED THE MOTOR IN THE DASH. SON RECEIVED HEAD INJURIES WOULD LIKE TO KNOW WHAT YOU ARE GOING TO DO ABOUT THIS. PICKUP WAS A TOTAL LOSS. FRAME WAS BENT. OUR ATTORNEY WOULD LIKE TO PUSH THIS BUT I WOULD LIKE TO KNOW WHAT YOU WILL DO FOR US FIRST. I HAVE PICTURES IF YOU WOULD LIKE TO SEE THEM. *JB
10154224	CHEVROLET	SILVERADO	2003	2006-03-23	DIRECT FRONTAL IMPACT WITH SIDE OF CAR THAT RAN RED LIGHT. AIR BAG DID NOT DEPLOY. SPEED WAS APPROXIMATELY 40-50 MPH. *JB
10577089	CHEVROLET	SILVERADO	2003	2013-11-14	I HIT A DEER HEAD ON AND TOTALED MY SILVERADO. I HIT IT AT 55 MPH AND NEITHER OF THE AIRBAGS DEPLOYED. *TR
10592423	CHEVROLET	SILVERADO	2003	2014-05-08	TRUCK COLIDED WITH GUARD RAIL. BOUNCED OFF, HIT VEHICLE 1, THEN INTO VEHICLE 2 THEN STOPPED AFTER HITTING VEHICLE 3 A SEMI TRUCK. ALL DAMAGE WAS DONE TO FRONT OF THE CHEVY SILVERADO. AT NO TIME DID THE AIRBAGS DEPLOY. SILVERADO WAS DETERMINED TO BE TOTALED DUE TO THE EXCESSIVE DAMAGE ON THE FRONT. AIRBAGS SHOULD HAVE DEPLOYED DURING ONE OF THE IMPACTS. *JS
10082050	CHEVROLET	SUBURBAN	2003	2004-07-14	THE CONSUMER WAS INVOLVED IN AN ACCIDENT WHERE IT WAS HIT FROM THE FRONT DRIVER SIDE, THE IMPACT CAUSED THE VEHICLE TO HIT A TELEPHONE POLE HEAD ON. THE AIR BAGS DID NOT DEPLOY. *JB
11360703	CHEVROLET	SUBURBAN	2003	2020-08-07	TL* THE CONTACT OWNED A 2003 CHEVROLET SUBURBAN. THE CONTACT STATED THAT WHILE TOWING HIS DAUGHTERS VEHICLE AT ABOUT 60 MPH, ANOTHER VEHICLE CRASHED INTO THE VEHICLE BEING TOWED. THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED A HEAD AND LOWER BACK INJURY. THE FRONT PASSENGER (HIS DAUGHTER) SUSTAINED A BACK INJURY. THE TWO WENT TO THE DOCTOR THREE DAYS LATER. THERE WAS NO POLICE REPORT. THE VEHICLE BEING TOWED WAS DAMAGED AND WAS DRIVEN TO THE DAUGHTERS DORM WHERE IT WAS TOTALED BY THE INSURANCE COMPANY. THE DEALER AND THE MANUFACTURER WERE NOT CONTACTED. THE CONTACT STATED THAT THE OTHER DRIVERS INSURANCE DENIED ANY COMPENSATION TO THE CONTACT, STATING THAT THE CONTACTS VEHICLE (THE VEHICLE TOWING THE DAMAGED VEHICLE) WAS NOT HIT. THE CONTACT STATED THAT AFTER THE ACCIDENT, A LOUD NOISE WAS HEARD WHENEVER THE VEHICLE WAS TURNED ON. THE CONTACT ALSO STATED THAT THE DASHBOARD WAS CRACKED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS APPROXIMATELY 173,000.
10899484	CHEVROLET	TAHOE	2003	2016-04-14	TL* THE CONTACT OWNED A 2003 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 45 MPH, THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO A GUARD RAIL. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE FRONT SEAT PASSENGER SUSTAINED 12 BROKEN RIBS AND 2 COLLAPSED LUNGS THAT REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS TOWED TO AN INDEPENDENT TOWING FACILITY. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS UNKNOWN. THE VIN WAS UNAVAILABLE.

10008283	CHEVROLET	TRACKER	2003	2003-02-28	I RENTED A CHEVROLET TRACKER 2003 AND WAS HIT HEAD ON BY ANOTHER DRIVER AND EVERYONE THERE NOTICE THAT THE AIRBAG DID NOT OPEN. THIS WAS A HEAD ON ACCIDENT. I WILL BE FILING THIS TO A LAWYER SHORT AS I WAS HURT. *JB
10052731	CHEVROLET	TRACKER	2003	2003-12-19	I WAS DRIVING ON I-190 IN THE RIGHT HAND LANE ON DEC 19, 2003. A CAR COMING UP AN ENTRANCE RAMP MERGED INTO MY LINE ALMOST HITTING ME. I SWERVED TO AVOID THE CRASH BUT SUBSEQUENTLY HIT SOME BLACK ICE AND WAS UNABLE TO RECOVER CONTROL. I HIT THE CONCRETE BARRIER HEAD ON. THE INSURANCE COMPANY'S (PROGRESSIVE) CLAIMS AGENT FIGURES I WAS GOING ABOUT 50 MPH AT IMPACT. THE IMPACT SO EXTREME THAT MY TRACKER SHIFTED ITSELF INTO 4WD AND TURNED ON THE HIGHBEAMS. BASICALLY ANYTHING THAT COULD GO FORWARD DID. THE WHOLE FRONT OF THE VEHICLE WAS PUSHED BACK 6" AND MY LISCENCE PLATE WAS RIPPED OFF, BUT YET MY AIRBAGS NEVER DEPLOYED. IF IT WEREN'T FOR MY SEATBELT, I MAY NOT BE HERE TO TYPE THIS. I HAD SEVERE WHIPLASH, AS WELL AS, PUTTING MY LEFT KNEE THROUGH MY DASH BOARD. THE IMPACT OF THE CRASH SHOULD HAVE HIT AT LEAST ONE, IF NOT ALL, SENSORS. I FEEL THIS IS A MAJOR PROBLEM. I WILL BE FILING A FORMAL COMPLAINT WITH CHEVY REGARDING THIS ISSUE.*AK
10097100	CHEVROLET	TRACKER	2003	2004-03-20	WHILE DRIVING 37 MPH THE VEHICLE WAS INVOLVED IN A HEAD ON COLLISION. THE AIR BAGS DID NOT DEPLOY UPON IMPACT. THE PASSENGER SUSTAINED SEVERE WHIPLASH. PLEASE PROVIDE ADDITIONAL INFORMATION. *JB
10216640	CHEVROLET	TRACKER	2003	2008-01-27	I WAS DRIVING HOME FROM WORK WHEN MY CAR SWERVED TO THE RIGHT AND WENT OF THE ROAD AND HIT A GROVE OF TREES HEAD ON. MY CAR WAS TOTALED AND NONE OF MY AIRBAGS WENT OFF. WHY DOES THIS HAPPEN I COULD HAVE BEEN KILLED. ALSO I RECEIVED A SAFETY NOTICE ABOUT MY CHEVEROLET TRACKER 4 DAYS BEFORE THIS HAPPENED HAVING A PROBLEM WITH THE FRONT SUSPENSION CROSSMEMBER DOE SOMEONE HAVE TO DIE BEFORE A RECALL IS DONE AND WHY DIDN'T MY AIR BAGS GO OFF SOMEONE PLEASE LOOK AT THIS CAR BEFORE IT GETS HAULED OFF BY THE ADJUSTER!!!!!! I WAS AIRLIFTED TO THE HOSPITAL THE FIRE DEPARTMENT CUT THE ROOF OF MY CAR OFF TO GET ME OUT NO AIRBAGS WHAT HAPPENED!!!! *TR
8023281	CHEVROLET	TRAILBLAZER	2003	2002-11-19	CONSUMER STATES THAT WHILE DRIVING APPROXIMATELY 35-40MPH SLID OFF ROAD AND CRASHED INTO A DITCH HEAD-ON. BOTH DRIVER AND PASSENGER AIR BAGS DID NOT DEPLOY. TS
10040870	CHEVROLET	TRAILBLAZER	2003	2003-09-25	TRAVELING 55 MPH WHEN ANOTHER VEHICLE CROSSED THE ROAD CAUSING ME TO HIT THE SIDE OF HIS VEHICLE HEAD ON. NO AIR BAGS DEPLOYED.
10054479	CHEVROLET	TRAILBLAZER	2003	2004-01-16	LOSING CONTROL OF MY VEHICLE ON ICY PAVEMENT , VEHICLE SLID OFF OF THE ROAD , HEAD-ON INTO A TREE. DRIVERS SIDE AND PASSENGER SIDE AIR BAGS FAILED TO DEPLOY. SERIOUS INJURIES OCCURED , WHICH MAY HAVE BEEN LESSENED IF THE SAFETY FEATURES WE PAY FOR ACTUALLY WORK.*AK ER DOCTORS AND STATE POLICE WERE TERRIBLY ANNOYED , SINCE THERE HAVE BEEN SEVERAL REPORTS OF SAME FAILURE IN DESIGN. NO RESPONSE FROM DEALER OR MANUFACTURER, AS OF YET !!!*AK
10055534	CHEVROLET	TRAILBLAZER	2003	2004-01-11	AFTER HITTING A TREE HEAD ON AIR BAGS DID NOT DEPLOY. *AK
10065438	CHEVROLET	TRAILBLAZER	2003	2004-03-24	WHILE DRIVING AT 40 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A FRONTAL COLLISION. CONSUMER WAS WEARING SEAT BELTS, BUT NONE OF THE AIR BAGS DEPLOYED. CONSUMER SUSTAINED A BROKEN NOSE,SCRAPES, AND BRUISES TO CHEST AND WRIST. *AK
10113264	CHEVROLET	TRAILBLAZER	2003	2004-08-01	CHEVROLET TRAILBLAZER 2003 UPON IMPACT AIRBAG DID NOT DEPLOY. *BF THE CONSUMER REAR ENDED ANOTHER VEHICLE. *JB
10174616	CHEVROLET	TRAILBLAZER	2003	2006-11-22	2003 CHEVY TRAILBLAZER AIR BAGS NEVER CAME OUT AFTER HAVING IMPACT INTO TWO TREES FORCING THE DRIVER INTO THE STEERING WHEEL. NOTHING AT THIS TIME HAS BEEN CORRECTED TO REPAIR THE SUV. GM NEED TO BE ALERTED OF THIS FAILURE TO CORRECT THE PROBLEM! *NM
10208796	CHEVROLET	TRAILBLAZER	2003	2007-11-10	TL*THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 40 MPH, THE CONTACT SWERVED TO AVOID AN ANIMAL AND CRASHED INTO A TREE. THE FRONT AIR BAGS FAILED TO DEPLOY. THE VEHICLE IS CURRENTLY AT A TOW YARD AND WILL BE TOWED TO THE INSURANCE COMPANY FOR INVESTIGATION. THE MANUFACTURER FILED A REPORT AND THE CONTACT IS AWAITING A CALL BACK. THE CURRENT AND FAILURE MILEAGES WERE 60,000.
10219898	CHEVROLET	TRAILBLAZER	2003	2008-02-08	TL*THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 32 MPH, THE CONTACT CRASHED INTO A BUILDING. THE VEHICLE WAS DESTROYED. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED INJURIES TO HER MOUTH AND EYE. THE AMBULANCE ARRIVED ON THE SCENE AND TRANSPORTED THE CONTACT TO THE HOSPITAL. A POLICE REPORT WAS FILED. CHEVROLET HAS NOT BEEN NOTIFIED. THE VIN, ENGINE SIZE, AND NUMBER OF CYLINDERS WERE UNKNOWN. THE CURRENT AND FAILURE MILEAGES WERE 71,000.
10223723	CHEVROLET	TRAILBLAZER	2003	2008-03-13	TL*THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 45 MPH, THE CONTACT REAR ENDED ANOTHER VEHICLE. THE FRONT AIR BAGS FAILED TO DEPLOY. THERE WERE NO INJURIES AND A POLICE REPORT WAS FILED. THE VIN AND ENGINE SIZE WERE UNKNOWN. THE FAILURE AND CURRENT MILEAGES WERE 77,000.
10229337	CHEVROLET	TRAILBLAZER	2003	2008-05-28	THE AIRBAG DID NOT DEPLOY IN A FRONT-END COLLISION THAT WILL MOST LIKELY TOTAL THE VEHICLE. THE OTHER VEHICLE'S DID DEPLOY. *TR
10308388	CHEVROLET	TRAILBLAZER	2003	2009-12-26	HAD CAR ACCIDENT WAS HIT BY ANOTHER VEHICLE AND HIT A RETAINING WALL GOING ABOUT 45 MILES AN HOUR AND AIR BAG DID NOT DEPLOY 2003 TRAIL BLAZER. *TR

10313800	CHEVROLET	TRAILBLAZER	2003	2009-12-26	TL*THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 45-50 MPH IN INCLEMENT WEATHER, THE CONTACT CRASHED INTO A RETAINER WALL. SHE STATED THAT OTHER PASSING VEHICLES PUSHED HER VEHICLE INTO THE RETAINER WALL. THE AIR BAG DID NOT DEPLOY. SHE WAS ALSO INJURED WHEN THE CRASH OCCURRED. THE MANUFACTURER STATED THAT THEY WOULD TAKE PICTURES OF THE VEHICLE. THE VEHICLE HAS NOT BEEN REPAIRED. A POLICE REPORT WAS FILED. THE FAILURE AND THE CURRENT MILEAGES WERE 82,000. THE CONSUMER STATED IT WAS A HIT AND RUN ACCIDENT. UPDATED 04/07/10.*JB
10315428	CHEVROLET	TRAILBLAZER	2003	2008-06-03	2003 CHEVROLET TRAILBLAZER. S10 COMEBACK FWD LTR TO POTUS RE COMPLAINT AGAINST GM REGARDING DEFECTIVE AIRBAG, INVOLVE IN CAR ACCIDENT AND THE AIRBAG DID NOT DEPLOY. *TGW THE CONSUMER STATED ANOTHER VEHICLE HIT A DEER, CROSSED THE CENTER LANE AND HIT THEIR VEHICLE HEAD ON. THE CONSUMER STATED THE SEAT BELTS DID NOT RESTRAIN THEM. *JB UPDATED PHONE NUMBER 05/28/10. *JB
10392644	CHEVROLET	TRAILBLAZER	2003	2011-01-23	TL*THE CONTACT OWNS A 2003 CHEVROLET BLAZER. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 45 TO 50 MPH IN THE RAIN HE CRASHED HEAD ON INTO ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. THERE WERE NO AIR BAG WARNING INDICATIONS PRIOR TO THE CRASH. THE DRIVER SUSTAINED A CONCUSSION AND INJURIES TO HIS NECK, KNEE, AND FEET. A POLICE REPORT WAS FILED. THE DRIVER WAS TRANSPORTED TO THE HOSPITAL BY AMBULANCE. THE MANUFACTURER WAS CONTACTED AND OFFERED NO ASSISTANCE. THE FAILURE COULD NOT BE DIAGNOSED SINCE THE INSURANCE COMPANY DEEMED THE VEHICLE AS BEING DESTROYED. THE FAILURE AND CURRENT MILEAGE WAS APPROXIMATELY 130,000. THE VIN WAS UNAVAILABLE. UPDATED 5/2/11 *CN UPDATED 1/11/11 *CN
10425103	CHEVROLET	TRAILBLAZER	2003	2011-09-03	MY WIFE AND I WERE INVOLVED IN A HEAD ON COLLISION (HIT BY A DRUNK DRIVER) OUR AIR BAGS DID NOT DEPLOY, I SUSTAINED A C7 FRACTURE, SCALPED BY THE REAR VIEW MIRROR (22 STITCHES TO HOLD MY SCALP) 6 STITCHES ON MY NOSE AND BRUISED KNEES. MY WIFE HAS A BROKEN NOSE ALL THE BONES IN HER RIGHT FOOT BROKEN AND BRUISED KNEES. *TR
10468222	CHEVROLET	TRAILBLAZER	2003	2010-05-07	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT HE CRASHED INTO A LIGHT POLE WHILE DRIVING AT UNKNOWN SPEEDS AND THE AIR BAGS DID NOT DEPLOY. THE CONTACT SUSTAINED INJURIES BUT WAS NOT TRANSPORTED TO THE HOSPITAL. THE POLICE WAS NOTIFIED OF THE CRASHED AND A REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT NOTIFIED. THE VIN WAS NOT AVAILABLE. THE FAILURE MILEAGE WAS 170,000.
10523466	CHEVROLET	TRAILBLAZER	2003	2013-07-04	WHILE TRAVELING IN SLOW TRAFFIC, THE CAR IN FRONT OF MY WIFE STOPPED. BY THE TIME SHE NOTICED THEY STOPPED IT WAS TOO LATE AND SHE HIT THE BACK OF THEIR FORD EXPLORER MOVING AT AROUND 20-30MPH. THE FRONT END OF OUR TRAILBLAZER WAS CRUSHED. MY DAUGHTER AND WIFE WERE WEARING THEIR SEAT BELTS. THE OFFICERS AND PARAMEDICS ON THE SCENE WERE SHOCKED THAT THE AIRBAGS DID NOT COME OUT WITH THE AMOUNT OF FRONT END DAMAGE. THEY HAD TO CUT THE BATTERY WIRES TO PREVENT THE AIRBAG FROM COMING OUT LATER WHEN SHE CLEANED OUT THE TRAILBLAZER. AN EXAMPLE OF HOW MUCH DAMAGE WAS TAKEN TO THE FRONT END, THE CORNER FENDERS WERE PUSHED BACK SO FAR THEY COULDN'T OPEN WITHER FRONT DOOR. THE FENDERS WERE CRUSHED INTO THE DOORS KEEPING THEM SHUT. I WOULD THINK WITH AN IMPACT LIKE THAT THE AIRBAGS WOULD HAVE CAME OUT, IT WAS A SQUARE HIT MEANING EVEN DAMAGE ACROSS THE FRONT END. *TR
10551243	CHEVROLET	TRAILBLAZER	2003	2013-09-26	DRIVING APPROXIMATELY 40 TO 43 MPH WHEN ANOTHER VEHICLE TURNED DIRECTLY IN FRONT OF ME. TOTAL FRONTAL DAMAGE BUCKLING UP HOOD ON MY CAR AS I HIT OTHER VEHICLE IN FRONT-END PASSENGER SIDE. THEIR AIRBAG DEPLOYED BUT MINE DIDN'T, EVEN WITH TOTAL FRONT END DAMAGE TO MY CAR. HAD SEATBELT ON, BUT DUE TO IMPACT STILL PULLED MY WHOLE BODY FORWARD (LIKE CRASH TEST DUMMY). THIS WAS A VERY HARD CRASH TOTALING MY CAR. *TR
10568108	CHEVROLET	TRAILBLAZER	2003	2008-02-14	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAIL BLAZER. THE WAS DRIVING 40 MPH, AND CRASHED INTO THE SIDE OF ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED INJURIES TO THE RIGHT SHOULDER, SPINAL STENOSIS AND FRACTURED KNEES. A POLICE REPORT WAS FILED OF THE INCIDENT. THE CONTACT STATED THAT SHE HAD ALSO BEEN INVOLVED IN TWO PRIOR CRASHES IN WHICH THE AIR BAGS FAILED TO DEPLOY. THE PREVIOUS CRASHES DID NOT RESULT IN ANY INJURIES AND A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS INSPECTED BY A REPRESENTATIVE SENT BY THE MANUFACTURER BUT THEY WERE UNABLE TO DETERMINE THE CAUSE OF THE AIR BAG FAILURE. THE FAILURE MILEAGE WAS 80,000. *TR
10596289	CHEVROLET	TRAILBLAZER	2003	2007-11-11	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAIL BLAZER. THE CONTACT STATED THAT WHILE DRIVING AN UNKNOWN SPEED, THE CONTACT ABRUPTLY APPLIED THE BRAKES TO AVOID A CRASH. THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO A CEMENT BARRIER. THE VEHICLE THEN ROLLED OVER AND LANDED IN AN EMBANKMENT. THE DRIVER'S SIDE AIR BAG FAILED TO DEPLOY. THE CONTACT SUFFERED INJURIES TO THE NECK AND A BROKEN LEG. THE CONTACT ALSO STATED THAT THE IGNITION SWITCH WAS REPLACED TWICE PRIOR TO THE CRASH. THE VIN WAS NOT AVAILABLE. THE VEHICLE WAS DESTROYED. THE CAUSE OF THE FAILURE WAS UNKNOWN. THE FAILURE AND CURRENT MILEAGE WAS 70,000.
10606954	CHEVROLET	TRAILBLAZER	2003	2006-08-08	AIRBAGS DID NOT DEPLOY DURING ACCIDENT. VEHICLE WENT THROUGH A GUARD RAIL, SUSTAINED FRONT END DAMAGE. *TR

10654364	CHEVROLET	TRAILBLAZER	2003	2002-10-26	2003 CHEVROLET TRAILBLAZER. CONSUMER STATED HER HUSBAND WAS INVOLVED IN AN ACCIDENT, AND THE AIR BAGS DID NOT DEPLOY. CONSEQUENTLY, HE DIED FROM HIS INJURIES. *SS UPDATED 02/09/15. *JB
10660781	CHEVROLET	TRAILBLAZER	2003	2014-11-23	TL* THE CONTACT OWNED A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 70 MPH, A DEER JUMPED IN FRONT OF THE VEHICLE CAUSING THE CONTACT TO CRASH. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED A NECK AND BACK INJURY THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 170,000.
10681428	CHEVROLET	TRAILBLAZER	2003	2015-01-24	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 35 MPH, THE VEHICLE SLID ON ICE AND CRASHED INTO A CEMENT WALL. THE AIR BAGS DID NOT DEPLOY AND THE SEAT BELT DID NOT RESTRAIN THE CONTACT. THE CONTACT SUSTAINED CHEST, NECK, AND KNEE INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DRIVEN TO THE CONTACT'S RESIDENCE. THE VEHICLE WAS THEN TAKEN TO AN INDEPENDENT MECHANIC, BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 70,000.
10694201	CHEVROLET	TRAILBLAZER	2003	2013-05-06	TL* THE CONTACT OWNED A 2003 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING AT 50 MPH DURING INCLEMENT WEATHER CONDITIONS, THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO AN EMBANKMENT. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED SPINE INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 90,000. UPDATED 5/11/15*CN
10721783	CHEVROLET	TRAILBLAZER	2003	2015-05-12	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER EQUIPPED WITH BF GOODRICH RUGGED TRAIL T/A TIRES, SIZE: P245/65R17. WHILE DRIVING AT 65 MPH, THE CONTACT HEARD A VIBRATION COMING FROM THE TIRES. THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO A POLE. THE VEHICLE ROLLED OVER MULTIPLE TIMES AND THE AIR BAGS FAILED TO DEPLOY. IN ADDITION, THE CONTACT NOTICED THAT THE THREADS FROM THE REAR DRIVER SIDE TIRE HAD SEPARATED. THE CONTACT SUSTAINED HEAD, SHOULDER, ELBOW, AND HIP INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE VEHICLE AND TIRE MANUFACTURERS WERE NOT NOTIFIED OF THE FAILURE. THE VEHICLE FAILURE MILEAGE WAS 116,000 AND THE TIRE FAILURE MILEAGE WAS 40,000. THE DOT NUMBER WAS UNAVAILABLE.
10787837	CHEVROLET	TRAILBLAZER	2003	2015-10-29	TL* THE CONTACT OWNED A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 20 MPH UPHILL, A VEHICLE TRAVELING DOWNHILL CRASHED HEAD ON INTO THE CONTACT'S VEHICLE. THE FRONTAL AIR BAGS DID NOT DEPLOY. THE PASSENGER SUSTAINED WHIPLASH AND BRUISES TO THE ELBOW, CHEST, AND STOMACH THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE PASSENGER WAS ALSO INJURED AND TAKEN TO THE HOSPITAL, BUT WAS RELEASED THE SAME DAY. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE VIN WAS INVALID. THE APPROXIMATE FAILURE MILEAGE WAS 141,000.
10850437	CHEVROLET	TRAILBLAZER	2003	2016-02-03	TL* THE CONTACT OWNED A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 50 MPH, THE VEHICLE SLID ON BLACK ICE AND CRASHED INTO A DITCH. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED A CUT TO THE HEAD AND A SEVERE BACK INJURY THAT REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED AND TOWED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 186,000.
10863408	CHEVROLET	TRAILBLAZER	2003	2016-05-03	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 25 TO 35 MPH, AN ANIMAL APPEARED IN THE ROAD. THE CONTACT SWERVED AND CRASHED INTO A TELEPHONE POLE. THE AIR BAGS DEPLOYED. THE VEHICLE WAS TOWED TO THE CONTACT'S RESIDENCE. THE MANUFACTURER WAS NOT AWARE OF THE FAILURE. A POLICE REPORT WAS NOT FILED. THE CONTACT SUSTAINED HEAD, NECK, AND CHEST INJURIES THAT REQUIRED MEDICAL ATTENTION. THE FAILURE MILEAGE WAS 135,000.....UPDATED 06/15/16 *BF *CN
10927873	CHEVROLET	TRAILBLAZER	2003	2016-11-22	TL* THE CONTACT OWNED A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 78 MPH, A TIRE BLEW OUT. THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED. THE VEHICLE WAS DESTROYED AND TOWED. THE AIR BAGS FAILED TO DEPLOY. THE DRIVER SUSTAINED AN INJURED LEFT SHOULDER AND NECK, AND A HEAD ABRASION, WHICH REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 115,000.
10934115	CHEVROLET	TRAILBLAZER	2003	2016-11-29	TL* THE CONTACT OWNED A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 40 MPH IN WET WEATHER, THE VEHICLE HYDROPLANED, DROVE OFF A CLIFF, AND CRASHED INTO A TREE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED CHEST, KNEE AND ARM INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS TOWED TO A TOWING AGENCY WHERE IT WAS DEEMED DESTROYED. THE FAILURE MILEAGE WAS 160,000. UPDATED 03/01/17*LJ *JS

10969901	CHEVROLET	TRAILBLAZER	2003	2017-03-25	I WAS INVOLVED IN A HEAD-ON COLLISION, I WAS GOING AROUND 10-15 MPH AND THE VEHICLE THAT CAUSED THE ACCIDENT WAS GOING FASTER THAN I WAS GOING. MY AIRBAGS DID NOT DEPLOY. THEY SHOULD DEPLOY BETWEEN 8-14 MPH. IS ANYONE HOLDING GENERAL MOTORS ACCOUNTABLE FOR THEIR NEGLIGENCE? WE WERE ON A TWO LANE CITY STREET.
10970795	CHEVROLET	TRAILBLAZER	2003	2017-03-25	TL* THE CONTACT OWNS A 2003 CHEVROLET TRAILBLAZER. WHILE DRIVING 35 MPH, THE VEHICLE WAS INVOLVED IN A HEAD ON COLLISION. THE CONTACT'S VEHICLE WAS STRUCK FROM THE FRONT END BY ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED INJURIES TO THE LEFT LEG AND LEFT ARM, WHICH REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS TOWED. IT WAS NOT DETERMINED WHETHER OR NOT THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 150,000.
10065821	GMC	ENVOY	2003	2004-04-05	MY WIFE WAS IN AN ACCIDENT WITH OUR NEW 2003 GMC ENVOY SLT, PURCHASED IN NOVEMBER OF 2003. TO AVOID REAR ENDING THE CAR IN FRONT OF HER, SHE SWERVED THE ENVOY OFF OF THE ROAD, DOWN A HILL AND AND HIT A TREE IN THE RIGHT FRONT OR PASSENGER SIDE OF THE VEHICLE. SHE HIT THE TREE WITH SUCH FORCE THAT THE DAMAGE TO THE FRONT OF THE VEHICLE RESULTED IN A TOTAL LOSS. MY CONCERN IS THE AIR BAGS NEVER DEPLOYED IN THIS ACCIDENT. I WOULD LIKE TO KNOW WHY? AND I WOULD LIKE TO KNOW MORE INFORMATION AS TO THE OPERATION OF THE AIR BAG SYSTEM IN A GMC ENVOY.*AK
10076184	GMC	ENVOY	2003	2004-05-20	CONSUMER'S VEHICLE REAR ENDED ANOTHER VEHICLE AT 25 MPH. UPON IMPACT, AIR BAGS DID NOT DEPLOY. DEALERSHIP WAS NOTIFIED, BUT DID NOT RESOLVE THE PROBLEM. *AK THE MANUFACTURER DID NOT EXCEPT RESPONSIBILITY. *SC
10101930	GMC	ENVOY	2003	2004-11-01	WHILE DRIVING, UPON IMPACT THE AIR BAGS DID NOT DEPLOY AFTER BEING STRUCK IN A SERIOUS FRONT END COLLISION. *BF *SC
10103710	GMC	ENVOY	2003	2004-11-22	CONSUMER'S VEHICLE WAS INVOLVED IN A HEAD ON COLLISION AT 35 MPH. UPON IMPACT, AIR BAGS DID NOT DEPLOY. CONSUMER WILL NOTIFY MANUFACTURER.*AK....POLICE REPORT INCLUDED
10103904	GMC	ENVOY	2003	2004-01-18	VEHICLE WAS INVOLVED IN A FRONT COLLISION ACCIDENT AT 15 MPH DUE TO WEATHER. UPON IMPACT, AIR BAGS DID NOT DEPLOY. DEALER WAS INFORMED BY CONSUMER. *AK THE CONSUMER STATED THAT THE VEHICLE COULD ONLY BE TURNED OFF BY CUTTING THE BATTERY CABLES. *TC
10259161	GMC	ENVOY	2003	2009-02-17	ACCIDENT ON 2/17/2009 FRONT CRASH TO OTHER VEHICLE AND AIR BAG DID NOT DEPLOY HOOD DAMAGE, WINDSHIELD DAMAGE, ALL FRONT DAMAGE, DOORS COULD NOT OPEN RADIATOR DAMAGE, ENGINE DAMAGE. *TR
10281810	GMC	ENVOY	2003	2009-08-25	MY HUSBAND FELL ASLEEP AT THE WHEEL ON HIS WAY TO WORK AND HIT SEVERAL TREES. THE CAR IS TOTALED BUT THE AIRBAGS DIDN'T GO OFF. I DO UNDERSTAND THAT THE ACCIDENT WAS 100% MY HUSBANDS FAULT BUT I DON'T UNDERSTAND WHY THE AIR BAGS DIDN'T GO OFF. *TR
10554787	GMC	ENVOY	2003	2013-11-25	TL* THE CONTACT OWNS A 2003 GMC ENVOY. THE CONTACT STATED THAT WHILE DRIVING AT AN UNKNOWN SPEED, HE SLIGHTLY CRASHED INTO A CURB AND THE VEHICLE TURNED OVER IN A DITCH. THE AIR BAGS DID NOT DEPLOY AND THE CONTACT SUSTAINED NECK AND LOWER BACK INJURIES. A POLICE REPORT WAS FILED OF THE INCIDENT. THE VEHICLE WAS DEEMED DESTROYED AND TOWED TO A SALVAGE YARD. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS UNAVAILABLE.
10560852	GMC	ENVOY	2003	2014-01-16	TL* THE CONTACT OWNS A 2003 GMC ENVOY. THE CONTACT STATED THAT WHILE DRIVING AT VARIOUS SPEEDS, THE CONTACT WAS INVOLVED IN A CRASH. THE VEHICLE TRAVELED DOWN AN EMBANKMENT AND CRASHED INTO A TREE. THE AIR BAGS FAILED TO DEPLOY AND THE CONTACT SUSTAINED INJURIES TO THE ARMS. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE VIN WAS NOT AVAILABLE. THE APPROXIMATE FAILURE AND CURRENT MILEAGE WAS 100,000. *TR
10592465	GMC	ENVOY	2003	2014-04-14	MY DAUGHTER WAS DRIVING THE ENVOY AT ABOUT 45 MPH WHEN A DRUNK DRIVER PULLED OUT IN FRONT OF TRAFFIC, CAUSING EVERYONE TO SLAM ON THEIR BRAKES, AND MY DAUGHTER WAS NOT ABLE TO STOP IN TIME BEFORE REAR-ENDING ANOTHER VEHICLE. THE CAR IS TOTALED BUT THE AIRBAGS NEVER DEPLOYED. *JS
10615166	GMC	ENVOY	2003	2012-06-04	I WAS DRIVING ABOUT 40 MPH WHEN I WENT THREW A YELLOW LIGHT WHEN A OLDER LADY TURN IN FRONT OF ME, I HIT HER ON THE PASSENGER SIDE BETWEEN THE FRONT N BACK DR, , PUSHING N ROLLING N TOTALING HER SMALL SUV. SHE WAS NOT SERIOUS HURT. MY AIRBAGS DID NOT DEPLOY. MY ENVOY WAS STILL DRIVEABLE . I TOOK MY ENVOY TO MY LOCAL GMC DEALER TO HAVE THEM FIND PROB WHY THE AIRBAGS DIDN'T GO OFF, THEY OR I CALLED A REP FOR GMC, TO COME TO SIOUX FALLS TO INVESTIGATE AND HE TOLD ME THAT THE REASON THEY DIDN'T DEPLOY WAS BECAUSE I WASN'T GOING FAST ENOUGH FOR IMPACT FOR DEPLOY. I THINK THAT IS BUNCH OF BULL. CAN SOMEONE HELP ME ,IS THERE ANYTHING I CAN DO .I HEAR THAT A PERSON CAN RECEIVE CASH FROM GMC IF A PERSON S AIRBAGS DON'T GO OFF. *TR

10682693	GMC	ENVOY	2003	2015-02-10	TL*THE CONTACT OWNS A 2003 GMC ENVOY. THE CONTACT STATED THAT WHILE DRIVING AT 5 MPH, THE CONTACT DEPRESSED THE ACCELERATOR PEDAL INSTEAD OF THE BRAKE PEDAL WHICH CAUSED THE VEHICLE TO CRASH INTO A TREE. AS A RESULT, THE AIR BAG FAILED TO DEPLOY. THE CONTACT SUSTAINED INJURIES TO THE NECK AND LEFT SHOULDER WHICH REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS NOT REPAIRED. THE VIN WAS NOT AVAILABLE. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 189,325.
10816234	GMC	ENVOY	2003	2015-12-19	FRONT AIR BAG DID NOT DEPLOY,DRIVING IN SNOW SLID AN HIT A TREE WAS DRIVING ON A HIGHWAY.
11093358	GMC	ENVOY	2003	2018-04-20	TL* THE CONTACT OWNED A 2003 GMC ENVOY. WHILE DRIVING APPROXIMATELY 25 MPH AND ATTEMPTING TO MAKE A LEFT TURN, THE CONTACT CRASHED INTO THE FRONT END OF ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE CONTACT SUSTAINED INJURIES THAT DID NOT REQUIRE MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DECLARED TOTALED BY THE INSURANCE COMPANY AND TOWED FROM THE SCENE. THE DEALER AND MANUFACTURER WERE NOT MADE AWARE OF THE FAILURE. THE VEHICLE WAS NOT DIAGNOSED. THE FAILURE MILEAGE WAS APPROXIMATELY 300,000.
10037631	GMC	YUKON	2003	2003-08-17	WHILE DRIVING ON A RESIDENTIAL STREET CONSUMER FELL ASLEEP BEHIND THE WHEEL AND HIT ANOTHER VEHICLE ON THE FRONT DRIVER'S SIDE. SLIGHT INJURIES WERE SUSTAINED BY THE PASSENGERS OF THE OTHER VEHICLE. CONSUMER SUFFERED RIB CONTUSIONS EVEN THOUGH SEAT BELTS WERE WORN. NONE OF THE AIR BAGS DEPLOYED. CONSUMER WAS GIVEN A CITATION BY THE POLICE THAT ARRIVED ON THE SCENE.*AK
10152567	GMC	YUKON	2003	2006-03-10	DT*: THE CONTACT STATED THE VEHICLE WAS INVOLVED IN A T-BONE COLLISION AT 10MPH AND THE AIRBAGS DID NOT DEPLOY. THERE WAS NO PRE-BRAKING PRIOR TO IMPACT. ALTHOUGH THE OCCUPANTS WERE WEARING SEATBELTS, MINOR INJURIES WERE SUSTAINED. THE VEHICLE WAS TOTALED BY THE INSURANCE AGENCY. THE POLICE WERE ON THE SCENE AND A REPORT WAS TAKEN. THE VEHICLE WAS NOT SEEN BY A DEALER FOR INSPECTION.
10160618	ISUZU	ASCENDER	2003	2006-03-21	DT: THE CONTACT STATED WHILE DRIVING ON THE INTERSTATE DURING RUSH HOUR AT 55 MPH, A VEHICLE HIT THE WALL AND TAIL SPINNED IN FRONT OF CONTACT'S VEHICLE. THE CONTACT HIT THE VEHICLE WITH A FRONTAL IMPACT CAUSING SEVERE DAMAGE. UPON IMPACT, THE NONE OF THE CONTACT'S AIR BAGS DEPLOYED. THE CONTACT WAS WEARING A SEATBELT HOWEVER INJURIES WERE SUSTAIN TO THE SHOULDERS, BACK AND NECK. WHEN THE VEHICLE WAS TAKEN TO THE DEALERSHIP, THEY DETERMINED THE VEHICLE WAS OPERATING PROPERLY HOWEVER THE AIRBAGS DID NOT DEPLOY. THE MANUFACTURER HAS BEEN ALERTED. A POLICE REPORT WAS FILED AT THE SCENE.
10266207	ISUZU	AXIOM	2003	2009-04-11	TL*THE CONTACT OWNS A 2003 ISUZU AXIOM. WHILE DRIVING LESS THAN 20 MPH, THE CONTACT REAR-ENDED THE PRECEDING VEHICLE. THE FRONT END OF HER VEHICLE WAS DAMAGED. THE AIR BAGS FAILED TO DEPLOY. THE DRIVER SUSTAINED MINOR NECK, LEG, AND BACK INJURIES. THE VEHICLE WAS TOWED TO A REPAIR SHOP AND COULD POSSIBLY BE LABELED AS DESTROYED. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE 135,850 UPDATED 05/08/09 *BF THE CONSUMER STATED THE DRIVER IN FRONT OF HIM/HER PULLED HIS EMERGENCY BRAKE BECAUSE THE DRIVER IN FRONT OF HIM STOPPED SUDDENLY AND THE CONSUMER NEVER SAW THE DRIVERS BRAKE LIGHTS. UPDATED 05/12/09. *JB UPDATED 06/09/09.*JB
11325218	ISUZU	AXIOM	2003	2020-05-15	DRIVING IN A LARGE PARKING LOT, HIT A LARGE CEMENT POLE DOING 20 MILES PER HOUR.AIR BAGS DID NOT DEPLOY. HAD NOT PUT MY SEAT BELT ON YET & HIT & SHATTERED THE WINDSHIELD KNOCKING OUT ALL OF MY FRONT UPPER TEETH. FRACTURED MAXILLA .WHY DID AIR BAGS NOT DEPLOY? *TR
8003267	CADILLAC	ESCALADE	2002	2001-07-19	WHILE DRIVING 40 MPH VEHICLE VEERED AND HIT A TELEPHONE POLE, AND AIR BAGS DIDNOT DEPLOY. DRIVER AND PASSENGER WERE INJURED. DEALER CONTACTED. HAD FRONTAL IMPACT. *AK
10064975	CHEVROLET	ASTRO	2002	2004-02-15	WHILE DRIVING 40 MPH VEHICLE WAS INVOLVED IN A FRONTAL COLLISION. UPON IMPACT, DUAL AIRBAGS DID NOT DEPLOY. NO INJURES WERE REPORTED. *AK
10178492	CHEVROLET	ASTRO	2002	2007-01-03	HIGH SPEED CAR ACCIDENT ON 1/3/07 DRIVER SEAT BELT DID NOT WORK CORRECTLY, BELT DID NOT LOCK UPON HARD BRAKING OR UPON CAR CRASH I HIT MY CHEST ON STEERING WHEEL AND MY KNEES ON DASHBOARD, MY AIRBAG DID NOT DEPLOY EITHER. *JB
10026532	CHEVROLET	BLAZER	2002	2003-06-20	CONSUMER STATES THAT WHILE DRIVING AT 35MPH. VEHICLE WAS IN A COLLISION. CONSUMER STATES THAT BOTH FRONT AIRBAGS DID NOT DEPLOY.DEALER NOTIFIED.*AK
10031954	CHEVROLET	BLAZER	2002	2003-06-20	VEHICLE RAN INTO THE BACK OF A SEMI-TRACTOR TRAILER AND AIR BAGS DID NOT DEPLOY BECAUSE IT DIDN'T CONSUMER SUSTAINED INJURIES, PAIN AND SUFFERING. DEALER NOTIFIED. *MR *CB
10048587	CHEVROLET	BLAZER	2002	2003-10-29	THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AND THE FRONT AIR BAGS DID NOT DEPLOY. THE DRIVER SUFFERED NECK AND BACK INJURIES. THE FRONT PASSENGER SUFFERED CHEST INJURIES. PLEASE PROVIDE FURTHER DETAILS. *JB

10347200	CHEVROLET	BLAZER	2002	2010-07-30	TL* THE CONTACT OWNS A 2002 CHEVROLET BLAZER. THE CONTACT WAS DRIVING APPROXIMATELY 35 MPH, AND CRASHED INTO AN UNOCCUPIED PARKED VEHICLE. THE AIR BAGS WOULD NOT DEPLOY WITH THE LEVEL OF IMPACT IN THE CRASH. WHILE THE FRONT DRIVER SIDE SHOULDER SEAT BELT WAS BEING WORN, IT FAILED TO FUNCTION AND CAUSED THE CONTACT TO MOVE IN A FORWARD POSITION AS A RESULT HER FACE STRUCK THE STEERING WHEEL. THE CONTACT SUSTAINED A BROKEN NOSE, BRUISES ON BOTH ARMS AND SHOULDER AREA. THE AMBULANCE, FIRE AND POLICE DEPARTMENT WERE CALLED TO THE SCENE. A POLICE REPORT WAS FILED OF THE INCIDENT. THE VEHICLE WAS TOWED TO A COLLISION FACILITY LOT. THE VEHICLE WAS COMPLETELY DESTROYED. THE FAILURE MILEAGE WAS APPROXIMATELY 130,000. UPDATED 10/13/10*BF UPDATED 10/14/10*JB
10402643	CHEVROLET	BLAZER	2002	2011-05-23	MY 2002 CHEVY BLAZER X-TREME AIR BAGS DIDN'T DEPLOY ON A FRONT END COLLISION AT THE SPEED OF 45 MPH, MY CAR HAS TOTAL DAMAGE. *TR
567453	CHEVROLET	SILVERADO	2002	2002-08-18	CONSUMER WAS INVOLVED IN AN ACCIDENT WHERE SHE WAS HIT HEAD ON THE RIGHT FRONT SIDE. THE AIRBAGS FAILED TO DEPLOY. CONSUMER WAS TOLD THE AIRBAGS DIDNT HAVE TO DEPLOY BECAUSE THE VEHICLE WAS STATIONARY DURING BOTH HITS, CONSUMER WAS INJURED IN THE ACCIDENT. *JG
767453	CHEVROLET	SILVERADO	2002	2002-09-01	IN DIRECT FRONTAL IMPACT AT 45 MPH, AIRBAGS FAILED TO DEPLOY.*AK
767929	CHEVROLET	SILVERADO	2002	2002-05-08	THIS TRUCK WAS INVOLVED IN A HEAD ON CRASH. I WAS RUNNING ABOUT 55 MPH AND THE OTHER VEHICLE WAS RUNNING APPROXIMATELY 35 MPH. THE TRUCK WAS A TOTAL LOSS WITH MOST OF THE DAMAGE DONE TO THE FRONT END.THE DRIVERS SIDE AIR BAG OR THE PASSENGER AIR BAG DID NOT DEPLOY. MR
767963	CHEVROLET	SILVERADO	2002	2002-09-26	THIS VEHICLE WAS INVOLVED IN A HEAD-ON COLLISION WHILE TRAVELING AT 50 MPH. BOTH THE DRIVER SIDE AND PASSENGER SIDE AIR BAGS DID NOT DEPLOY. MR
8000974	CHEVROLET	SILVERADO	2002	2001-12-10	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT 25MPH. UPON IMPACT, AIRBAGS DID NOT DEPLOY. *AK *YH
8003037	CHEVROLET	SILVERADO	2002		VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT 40-45MPH. UPON IMPACT AIR BAGS DID NOT DEPLOY. DEALER HAS BEEN CONTACTED. PLEASE PROVIDE ADDITIONAL INFORMATION.*AK
8010265	CHEVROLET	SILVERADO	2002	2002-05-21	WHILE DRIVING AT 35 MPH, THE VEHICLE WAS HIT BY AN AMBALANCE, THE AIR BAGS DIDN'T DEPLOY RESULTING IN MAJOR INJURIES TO DRIVER.*AK *MJ
8011057	CHEVROLET	SILVERADO	2002	2002-05-19	VEHICLE WAS INVOLVED IN A FRONTAL IMPACT GOING 35MPH. AIR BAG DIDN'T DEPLOY, AND LIGHT NEVER ILLUMINATED. CHEVROLET WAS CONTACTED, AND WILL BE SENDING AN INSPECTOR OUT FOR VEHICLE. PLEASE PROVIDE MORE INFORMATION.*AK
8011088	CHEVROLET	SILVERADO	2002	2002-05-12	VEHICLE WAS INVOLVED IN A 30-40 MPH FRONTAL COLLISION IN WHICH DRIVER'S AND PASSENGER'S AIR BAGS DID NOT DEPLOY, CAUSE UNKNOWN. PLEASE GIVE ANY FURTHER DETAILS.*AK
8016806	CHEVROLET	SILVERADO	2002	2002-08-19	CONSUMER WAS TRAVELING ABOUT 20MPH ON A SIDE STREET AND THERE WAS A CONCRETE PIPE LAYING ON THE ROAD, AND WITHOUT PRIOR WARNING SHE HIT THE PIPE. AIRBAGS DIDN'T GO OFF. AT DEALERSHIP IS AWARE OF PROBLEM.THE PIPE WAS A BROKE OFF LIGHT POLE. THE FRAME ON THE VEHICLE IS BENT. *JG
8017234	CHEVROLET	SILVERADO	2002	2002-08-19	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH A TREE TRAVELING APPROXIMATLY 30-40MPH, AND AIR BAGS DID NOT DEPLOY.*AK
8019177	CHEVROLET	SILVERADO	2002	2002-08-23	WHILE DRIVING AT 72 MPH CONSUMER HIT ANOTHER VEHICLE HEAD ON AND NONE OF THE AIR BAGS DEPLOYED. CONTACTED DEALER, AND DEALER STATED THAT THE VEHICLE ACTED LIKE IT SHOULD HAVE.AK
8021266	CHEVROLET	SILVERADO	2002	2002-07-19	CONSUMER STATES WHILE DRIVING 45MPH HAD A HEAD ON COLLISION AIR BAG DID NOT DEPLOY. TS
8024161	CHEVROLET	SILVERADO	2002	2002-11-19	CONSUMER STATES THAT WHEN HIT AT 55 MPH IN THE FRONT CENTER OF THE VEHICLE THE AIR BAG DID NOT DEPLOY CAUSING MINOR INJURIES TO THE CONSUMER. DEALER NOTIFIED. MR
10004706	CHEVROLET	SILVERADO	2002	2002-12-16	CONSUMER COMPLAINED ABOUT HAVING PROBLEMS WITH THE AIR BAG DEPLOYMENT. ALSO, WHILE DRIVING VEHICLE WAS INVOLVED IN A COLLISION, AND AIR BAGS DID NOT DEPLOY .PASSENGER WAS DRIVING AT 50 MPH WHEN PASSING OVER A BRIDGE ON A RAINY DAY, AND WATER FROM THE RIVER WAS SPLASHED ON THE FRONT WINDSHIELD WHICH CAUSED THE DRIVER TO LOOSE CONTROL OF THE VEHICLE. MANUFACTURE WAS NOT CONTACTED AT THE TIME OF THIS PHONE CALL. *AK
10005976	CHEVROLET	SILVERADO	2002	2003-01-29	WHILE DRIVING VEHICLE WAS IN A FRONTAL COLLISION, BUT NONE OF THE AIR BAGS DEPLOYED UPON IMPACT. THE DRIVER WAS NOT INJURED BECAUSE THEY WERE WEARING THERE SEAT BELTS.*AK
10009099	CHEVROLET	SILVERADO	2002	2003-02-21	THE VEHICLE HIT A TREE, AND NONE OF THE AIR BAGS DEPLOYED.*JB *TS
10015548	CHEVROLET	SILVERADO	2002		THE VEHICLE WAS INVOLVED IN A FRONT END COLLISION YET NEITHER FRONTAL AIR BAGS DEPLOYED. *NLM
10019853	CHEVROLET	SILVERADO	2002		THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AND NONE OF THE AIR BAGS DEPLOYED. *JB
10042035	CHEVROLET	SILVERADO	2002		WHILE DRIVING AT 43 MPH VEHICLE WAS INVOLVED IN A LEFT FRONT COLLISION. UPON IMPACT, FRONT AIR BAGS DID NOT DEPLOY, AND PASSENGER SUSTAINED INJURIES. *AK

10073268	CHEVROLET	SILVERADO	2002	2002-08-11	I WAS AT A COMPLETE STOP AT A RED LIGHT WHEN A YOUNG LADY RAN THE LIGHT FROM THE OPPOSITE DIRECTION. SHE HIT ANOTHER TRUCK THEN CROSSED OVER INTO MY LANE HITTING ME ON MY RIGHT FRONT BUMPER. LESS THAN 3 SECONDS LATER THE OTHER TRUCK HIT ME HEAD ON AT 35-40 MPH HEAD ON. THE IMPACT WAS HARD ENOUGH TO THROW ME BACKWARDS INTO SOME MOTORCYCLES BEHIND ME. MY FRONTAL AIRBAGS DID NOT DEPLOY DURING EITHER HIT. *MR
10080276	CHEVROLET	SILVERADO	2002	2004-06-27	WHILE DRIVING 45 MPH THE DRIVER ATTEMPTED TO AVOID A DEER IN THE STREET. AS A RESULT THE DRIVER LOST CONTROL OF THE VEHICLE AND HIT A TREE HEAD ON. THE CONSUMER STATED THAT,"NEITHER FRONTAL AIR BAG DID DEPLOYED ON IMPACT". THE CONSUMER WILL CONTACT THE DEALER. *NM
10115806	CHEVROLET	SILVERADO	2002	2005-03-24	A PIECE OF FURNITURE WAS LOCATED IN THE MIDDLE OF THE HIGHWAY WHILE DRIVING, CAUSING THE DRIVER TO HIT THE FURNITURE. DRIVER LOST CONTROL OF A VEHICLE ,AND IT CRASHED INTO A CONCRETE WALL. DRIVER'S SIDE SEAT BELT FAILED, AND THE AIRBAGS DID NOT DEPLOY. DRIVER REFUSED MEDICAL ATTENTION AT THAT TIME AND WENT TO THE HOSPITAL ON HIS OWN. VEHICLE WAS TOWED BY THE INSURANCE COMPANY. *AK
10127515	CHEVROLET	SILVERADO	2002	2005-07-05	DT: CONTACT STATES WHILE DRIVING APPROXIMATELY 45 MPH THERE WAS A FRONT END COLLISION. UPON IMPACT, NEITHER AIR BAG DEPLOYED. *AK
10246829	CHEVROLET	SILVERADO	2002	2008-10-13	TL*THE CONTACT OWNS A 2002 CHEVROLET SILVERADO. WHILE DRIVING 30 MPH, THE CONTACT STRUCK A DEER AND SWERVED INTO A DITCH. HIS CHEST SLAMMED INTO THE STEERING WHEEL AND WAS INJURED. THE AIR BAGS FAILED TO DEPLOY AND THE SEAT BELT DID NOT RETRACT. THE DRIVER'S SIDE BUMPER WAS CRUSHED INTO THE FRONT GRILL ALL THE WAY ACROSS TO THE PASSENGER SIDE OF THE VEHICLE. THE CONTACT CALLED THE INSURANCE AGENT, BUT NO POLICE REPORT WAS FILED. HE WAS THE ONLY OCCUPANT IN THE VEHICLE AND THE SEAT BELT WAS WORN PROPERLY AT THE TIME OF THE CRASH. THERE WAS NO MAINTENANCE PERFORMED ON THE AIR BAGS OR SEAT BELT PRIOR TO THE FAILURES. THE CONTACT FILED A COMPLAINT WITH GM CONCERNING HIS AIR BAGS AND SEAT BELT (COMPLAINT NUMBER 71-670143505). GM IS NOT TAKING RESPONSIBILITY FOR THE AIR BAG FAILURE. IN ADDITION, NO ONE CAME OUT TO INSPECT THE VEHICLE. THE FAILURE MILEAGE WAS 61,752.
10281236	CHEVROLET	SILVERADO	2002	2007-11-29	TL*THE CONTACT OWNS A 2002 CHEVROLET SILVERADO. WHILE DRIVING APPROXIMATELY 45 MPH ON NORMAL ROAD CONDITIONS, A VEHICLE CRASHED INTO THE FRONT OF THE DRIVER SIDE. THE CONTACT WAS TRANSPORTED TO THE HOSPITAL AFTER SUSTAINING INJURIES TO THE HEAD, NECK AND LIP. THE AMBULANCE AND POLICE ARRIVED AND A POLICE REPORT WAS FILED. THE AIR BAGS FAILED TO DEPLOY WITH THE MASSIVE LEVEL OF IMPACT. THERE WERE NO WARNING LIGHT INDICATORS ILLUMINATED ON THE INSTRUMENT PANEL AFTER THE CRASH. THE FRONT END OF THE VEHICLE SUSTAINED SEVERE DAMAGE. THE VEHICLE WAS TOWED TO A COLLISION CENTER AND THE VEHICLE WAS REPAIRED. THE CONTACT HAD CONCERNS OF THE SAFETY RISK INVOLVED. THE FAILURE MILEAGE WAS 40,000 AND THE CURRENT MILEAGE WAS 55,000.
10679097	CHEVROLET	SILVERADO	2002	2015-01-16	I T-BONED A MINI VAN THAT FAILED TO TO YIELD ON A TURN AT 35 MPH, MY AIRBAGS DID NOT DEPLOY. *TR
10039711	CHEVROLET	SUBURBAN	2002	2003-08-27	WHILE DRIVING AT 45 MPH VEHICLE WAS FORCED OFF OF THE ROAD INTO ONCOMING TRAFFIC. CONSUMER SWERVED TO AVOID A HEAD ON COLLISION WITH ANOTHER VEHICLE. THIS ACTION CAUSED THE VEHICLE TO CRASH THROUGH A FENCE, RUN INTO A DITCH, AND COLLIDE HEAD ON WITH AN OAK TREE. SEAT BELTS WERE WORN, BUT AT THE TIME OF THE IMPACT, THE LATCH CAME APART. VEHICLE WAS EQUIPPED WITH FRONT AND SIDE AIR AIR BAGS. UPON IMPACT, THEY DID NOT DEPLOY. CONSUMER'S KNEE WAS BROKEN, AND HE SUFFERED A CONCUSSION. POLICE AND MEDICAL HELP DID ARRIVE ON THE SCENE. MANUFACTURER AND THE DEALER HAVE BEEN NOTIFIED OF THE INCIDENT. *AK
10041031	CHEVROLET	SUBURBAN	2002	2003-01-07	I WAS HIT ON THE HEAD INSIDE MY 2002 SUBURBAN, WEARING MY SEAT BELT AT 48 MPH BY AN ONCOMING MAZDA MIATA. MY STEERING COLUMN COLLAPSED, I WENT INTO ONCOMING 3 LANES OF TRAFFIC, WENT UP A CURB, WENT THROUGH A BRICK RETAINING WALL, AND HIT A TELEPHONE POLE. MY AIRBAG DID NOT DEPLOY ON ANY OF THE 3 IMPACTS. WHY? ALSO, MY DRIVER'S SEAT CAME OFF THE TRACK. *LA
10108747	CHEVROLET	SUBURBAN	2002	2004-11-11	THE CONSUMER WAS INVOLVED IN AN ACCIDENT. THE CONSUMER WAS DRIVING ABOUT 60 MPH AND REAR ENDED ANOTHER VEHICLE AND THE AIR BAGS FAILED TO DEPLOY. ALSO THE SEAT BELTS DID NOT HOLD THE DRIVER AND PASSENGER CAUSING THEM TO GO FORWARD INTO THE WINDSHIELD. PROVIDE FURTHER DETAILS. *JB
10121922	CHEVROLET	SUBURBAN	2002	2005-05-14	DT: HUSBAND HAD AN ACCIDENT, CAR PULLED OUT IN FRONT OF HIM AND HIT THEM ON DRIVER AND BACK SEAT PASSENGER SIDE HEAD. UPON IMPACT, AIR BAG DID NOT DEPLOY.*AK
568470	CHEVROLET	TAHOE	2002	2002-06-05	ON TWO OCCASIONS THE FRONT AIR BAGS FAILED TO DEPLOY UPON FRONT IMPACT. THE VEHICLE WAS INSPECTED BY A CRASH INVESTIGATOR WHO TOLD THE CONSUMER THAT THE VEHICLE OPERATED AS DESIGNED. *NLM
8022842	CHEVROLET	TAHOE	2002	2002-10-10	THE TRUCK HIT A WALL HEAD ON BETWEEN 33-35 MPH. THE AIR BAGS FAILED TO DEPLOY UPON IMPACT ALLOWING THE DRIVER TO HIT THE WINDSHIELD WITH HIS HEAD SHATTERING IT. GENERAL MOTORS SENT SOMEONE TO DIAGNOSE THE TRUCKS' CONDITION WHICH THE CONSUMER WAS TOLD "EXCEPTIBLE STANDARDS". PLEASE DESCRIBE DETAILS TS

10050631	CHEVROLET	TAHOE	2002	2003-12-04	HAD A FRONT END COLLISION INTO THE SIDE OF ANOTHER VEHICLE WHOM RAN A RED LIGHT. WE ESTIMATED OUR IMPACT SPEED AT 30 MPH UPON COLLIDING TOGETHER. NEITHER FRONT AIRBAGS DEPLOYED. SUFFERED NECK AND BACK BRUISING AND MUSCLE STRAIN.*AK
10057036	CHEVROLET	TAHOE	2002	2004-01-23	ON JANURAY 23. 2004, I WAS REAR-ENDED ON THE FREEWAY. I WAS GOING ABOUT 65-70 MPH. A PERSON HIT ME FROM THE REAR, HE WAS TRAVELLING AROUND 100-110 MPH. I LOST CONTROL OF MY TAHOE, I WENT SIDEWAYS, THEN I SHOT FORWARD AND HIT THE CENTER DIVIDER(ON THE CENTER RIGHT SIDE OF MY CAR) AT ABOUT 65 MPH OR FASTER, I WAS SHOT BACKWARDS INTO A GUARD RAIL AND CAME OFF OF THAT AND THEN THE TAHOE ROLLED ON TO ITS SIDE, SKID FOR ABOUT 30 FEET AND THEN IT FINALLY STOPPED. MY AIR BAGS(FRONT NOR SIDE) NEVER DEPLOYED. I FEEL THAT IF THEY HAD MY WIFE NOR I WOULD HAVE BEEN INJURED. I KNOW THAT THEY ARE DESIGNED TO DEPLOY WHEN YOU HIT SOMETIME LIKE A BRICK WALL AT ABOUT 10-15 MPH. WHAT DO YOU CALL HITTING A CEMENT DIVIDER AT OVER 65 MPH.*AK
10080735	CHEVROLET	TAHOE	2002	2004-01-23	I WAS TRAVELING DOWN TO FREEWAY, DOING ABOUT 65-70 MPH. I WAS REAR ENDED BY A GUY GOING BETWEEN 100-110 MPH, I WAS THROWN OUT OF CONTROL. I HIT THE CENTER DIVIDER ALMOST HEAD ON AT ABOUT 70 MPH. I THEN BOUNCED OFF THE DIVIDER, CAME CLEAR AGCROSS ALL LANES AND HIT THE REAR GUARD RAIL, I BOUNDED OFF THAT AND ROLLED ON ITS SIDE. IN ALL MY AIR BAGS NEVER DEPLOYED.*AK
10143613	CHEVROLET	TAHOE	2002	2005-11-15	I WAS DRIVING MY 2002 TAHOE ABOUT 30-35 MPH WHEN I BLACKED OUT AND LOST CONTROL OF THE VEHICLE. I HIT A COLUMN OUTSIDE A HOTEL WHICH WAS ABOUT 2X2 FEET WITH STEEL WITHIN THE CENTER OF THE COLUMN. MY TRUCK WAS A TOTAL LOST AND THE FRONT AIRBAGS DID NOT DEPLOY AS THEY WERE SUPPOSED TO. *JB
10152394	CHEVROLET	TAHOE	2002	2006-03-09	DT*: THE CONTACT STATED WHILE DRIVING 55 MPH, THE FRONT DRIVER SIDE TIRE HAD A BLOW OUT, CAUSING THE VEHICLE TO HIT BOTH GUARD RAILS WITH THE FRONT END. THE AIRBAGS DID NOT DEPLOY. ALTHOUGH THE SEATBELT WAS WORN, THE CONTACT SUSTAINED A CONCUSSION. THERE WAS A POLICE REPORT TAKEN AT THE SCENE. THE VEHICLE WAS TOWED TO AN AUTO BODY SHOP, WHERE IT WAS DEEMED A TOTAL LOSS BY THE INSURANCE COMPANY.
10155306	CHEVROLET	TAHOE	2002	2006-03-24	ON MY WIFE'S WAY HOME FORM WORK SHE WAS INVOLVED IN AN ACCIDENT, WERE SHE REAR ENDED ANOTHER VEHICLE, THE CRASH WAS AT ABOUT 35 TO 45 MILES PER HOUR AND IT AFFECTED THE FRONT DRIVER SIDE OF OUR 2002 CHEVY TAHOE. THE IMPACT WAS SO SIGNIFICANT THAT THE FRAME OF THE TAHOE WAS BENT. THE CRASH PRETTY MUCH MIMICKED THE SAME OFF CENTER FRONT CRASH THAT THE INSURANCE INSTITUTE FOR HIGHWAY SAFETY CONDUCTS ON THEIR TESTING. THE PROBLEM WAS THAT THE FRONT AIRBAGS NEVER DEPLOYED ALTHOUGH THE ACCIDENT HAPPENED UNEXPECTEDLY, MY WIFE WAS WEARING HER SEAT BELT AND DIDN'T SUSTAINED SERIOUS INJURIES. OUR CONCERN IS THAT THE BAGS NEVER DEPLOYED AND THAT THEY MIGHT DEPLOY AT ANYTIME. THE AUTO BODY SHOP RECOMMENDED BY OUR INSURANCE COMPANY TOLD US THAT BECAUSE THE CRASH IMPACT WAS OFF CENTERED THE AIRBAG SENSOR WERE NEVER TRIGGERED. AFTER SEEING SO OF THE INSURANCE INSTITUTE FOR HIGHWAY SAFETY TEST THE BAGS SHOULD HAVE DEPLOYED. ALSO IT WAS DETERMINED THAT THE FRAME HAS TO BE REPLACED AND ALL THE BODY PARTS FIXED AND REPLACED. IF THE FRAME HAS TO BE REPLACED HOW SAFE WOULD THAT VEHICLE BE? I AM OPEN FOR ANY FARTHER CONVERSATIONS ABOUT THIS TOPIC. THANK YOU. *JB
10353935	CHEVROLET	TAHOE	2002	2010-07-28	I WAS DRIVING MY 2002 CHEVY TAHOE, A GENTLEMAN RAN A STOP SIGN, I HIT HIM AT 39 MPH, HEAD ON IN MY TAHOE, T-BONED HIS TRUCK. NEITHER AIRBAG DEPLOYED, NOR DID MY SEATBELT KEEP ME FROM HITTING THE STEERING WHEEL AND MY HEAD KNOCKING ME OUT. GM SENT SOMEONE TO LOOK AT MY CAR WHICH HAS BEEN DEEMED A TOTAL LOSS. I HAVE YET TO HEAR BACK FROM GM ON THIS INCIDENT. I PURCHASED THIS CAR BRAND NEW THINKING IT WAS SAFE. THE ONE TIME I NEEDED MY SEATBELT TO WORK, IT FAILED. THE COMPUTER IN MY CAR SHOWED BOTH SEATBELTS WERE ON AND IN WORKING ORDER, IT SHOWED THE CRASH WAS AT 39 MPH YET THE AIRBAGS DID NOT DEPLOY AND THEY WERE IN PROPER WORKING ORDER. WHATEVER ANSWER GM GIVES ME WILL NOT BE GOOD ENOUGH UNLESS THEY ADMIT TO FAULTINESS IN THEIR EQUIPMENT. *TR
10458444	CHEVROLET	TAHOE	2002	2012-04-08	REAR ENDED A VEHICLE GOING APPROX. 70 MPH AND HAD EXTENSIVE FRONT END DAMAGE HOWEVER THE AIR BAGS FAILED TO DEPLOY. DRIVER HIT HEAD ON STEERING WHEEL AND PASSENGER SUFFERED SEVER HEAD INJURY. *JS
10498415	CHEVROLET	TAHOE	2002	2013-02-14	TRAFFIC STOPPED IN FRONT OF ME UNEXPECTEDLY, I SWERVED TO AVOID CAR IN FRONT OF ME AND HIT CONCRETE WALL. AIR BAGS DID NOT WORK. MY FACE HIT STEERING WHEEL, CAUSING INJURY TO NOSE AND MOUTH. *TR
10615602	CHEVROLET	TAHOE	2002	2014-07-08	TL* THE CONTACT OWNS A 2002 CHEVROLET TAHOE. WHILE DRIVING 45 MPH, THE CONTACT'S VEHICLE WAS REAR ENDED BY ANOTHER VEHICLE. AND CRASHED INTO A GUARD RAIL. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED AND THE VEHICLE WAS DESTROYED. THE CONTACT'S HEAD STRUCK THE STEERING WHEEL AND HE WAS TRANSPORTED TO THE HOSPITAL BY AMBULANCE. THE CONTACT SUSTAINED SPINAL CORD AND NECK INJURIES. THE DOCTOR X-RAYED THE CONTACT AND DIAGNOSED HIM WITH BURNING PARESTHESIA, HYPER-ESTHESIA, AND CENTRAL CORD SYNDROME. THE CONTACT WAS RELEASED FROM THE HOSPITAL TWO DAYS AFTER THE CRASH. THE FAILURE MILEAGE WAS 285,000.

10641399	CHEVROLET	TAHOE	2002	2011-06-07	TL - THE CONTACT OWNS A 2002 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE THE DRIVER WAS DRIVING AT 45 MPH AND ATTEMPTED TO AVOID A CRASH WITH ANOTHER VEHICLE. AS A RESULT, THE DRIVER CRASHED INTO A GUARDRAIL AND THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT WAS TAKEN TO A HOSPITAL AND SUSTAINED INJURIES TO THE RIBS, THE COLLAR BONES, A BRAIN TRAUMA AND A COLLAPSED LUNG. THE DRIVER SUFFERED FROM FATAL INJURIES. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 73,000. DR
10667110	CHEVROLET	TAHOE	2002	2011-06-07	TL* THE CONTACT OWNS A 2002 CHEVROLET TAHOE. THE CONTACT STATED THAT THE DRIVER CRASHED INTO A GUARD RAIL AND THE AIR BAGS FAILED TO DEPLOY. THE DRIVER SUSTAINED MASSIVE HEAD TRAUMA, BROKEN RIBS AND BLEEDING FROM THE BRAIN, RESULTING IN A FATALITY. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE CONTACT WAS UNAWARE IF THE VEHICLE WAS DIAGNOSED OF THE FAILURE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 72,000.
10668043	CHEVROLET	TAHOE	2002	2014-11-07	TL* THE CONTACT OWNS 2002 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING 45 MPH, ANOTHER VEHICLE CRASHED INTO THE CONTACT'S VEHICLE CAUSING THE VEHICLE TO SPIN AND BECOME UNCONTROLLABLE. IN ADDITION, ANOTHER VEHICLE CRASHED INTO THE VEHICLE CAUSING IT TO ROLL OVER SEVERAL TIMES BEFORE CRASHING INTO A GUARD RAIL. THE AIR BAGS FAILED TO DEPLOY. THE DRIVER SUSTAINED CRITICAL INJURIES AND THE FRONT PASSENGER SUSTAINED FATAL INJURIES. BOTH THE CONTACT AND FRONT PASSENGER REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 130,000.
10746088	CHEVROLET	TAHOE	2002	2011-06-07	TL* THE CONTACT OWNED A 2002 CHEVROLET TAHOE. WHILE DRIVING AT APPROXIMATELY 45 MPH, THE CONTACT CRASHED INTO A GUARD RAIL. THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED A FRACTURED COLLAR BONE, SEVERAL BROKEN RIBS, HEAD TRAUMA, BRAIN BLEEDING, AND STROKES. THE CONTACT WAS PLACED INTO A MEDICALLY INDUCED COMA AND ON A RESPIRATORY MACHINE, BUT LATER DIED. THE VEHICLE WAS TOWED TO A SAVAGE YARD. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 73,000.
11382901	CHEVROLET	TAHOE	2002	2020-11-17	TL- THE CONTACT OWNS A 2002 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 25 MPH WHEN THE VEHICLE RAN ACROSS BLACK ICE CAUSING THE CONTACT TO LOSE CONTROL OF THE VEHICLE. THE VEHICLE BEGAN TO SPEND UNCONTROLLABLY EVENTUALLY CRASHING INTO A CONCRETE WALL WITH THE FRONT-END OF THE VEHICLE. NO AIR BAGS DEPLOYED. THE CONTACT RECEIVED INJURIES TO THEIR KNEE, SHOULDER, NECK, BACK, AND EYE. MEDICAL ATTENTION WAS NEEDED. A POLICE REPORT WAS FILED. THE VEHICLE TOWED AND DEEMED TOTALED. THE DEALER WAS NOT CONTACTED. THE MANUFACTURER WAS NOT MADE AWARE OF THE ISSUE. THE APPROXIMATE FAILURE MILEAGE WAS 150,000. GL
8017394	CHEVROLET	TRACKER	2002	2002-08-09	WHILE DRIVING AT 45 MPH CONSUMER T-BONED ANOTHER VEHICLE HEAD ON AND NONE OF THE AIR BAGS DEPLOYED. CONTACTED DEALER, AND THE DEALER WAS AWARE OF THE PROBLEM, BUT THEY HAD NO SOLUTION. *AK
10087309	CHEVROLET	TRACKER	2002	2004-07-20	WHILE DRIVING AT 40 MPH CONSUMER'S VEHICLE COLLIDED WITH THE LEFT SIDE OF ANOTHER VEHICLE RUNNING A STOP SIGN. CONSUMER WAS WEARING SEAT BELTS, BUT AIR BAGS DID NOT DEPLOY. CONSUMER AND A PASSENGER SUSTAINED VARIOUS BONE FRACTURES AND BRUISES. THE POLICE AND AN AMBULANCE DID ARRIVED ON THE SCENE.*AK
10264048	CHEVROLET	TRACKER	2002	2009-03-29	TL*THE CONTACT OWNS A 2002 CHEVROLET TRACKER. WHILE DRIVING AT AN UNKNOWN SPEED, THE VEHICLE LEFT THE ROAD, AND STRUCK A TREE WITH THE FRONT PASSENGER SIDE AND FENDER. THE FRAME WAS BENT IN TWO PLACES, BUT THE AIR BAGS FAILED TO DEPLOY. THERE WERE NO INJURIES. THE SEAT BELT WAS NEVER SERVICED AND WAS WORKING FINE PRIOR TO THE CRASH. A POLICE REPORT WAS FILED. THE FAILURE MILEAGE WAS 95,000.
10970730	CHEVROLET	TRACKER	2002	2017-04-05	AFTER A COLLISION WHERE MY TRACKER HIT ANOTHER VEHICLE AT AROUND 55 MPH ON A HIGHWAY, MY VEHICLE HIT DEAD ON TO THE SIDE OF ANOTHER (T-BONE) AND MY SENSOR SHOULD HAVE TRIGGERED MY AIRBAGS AND DID NOT.
8002085	CHEVROLET	TRAILBLAZER	2002	2002-01-03	WHILE BEING DRIVEN APPROXIMATELY 20 TO 25 MPH VEHICLE WENT OFF THE ROAD AND CRASHED INTO A LARGE OAK TREE. BOTH FRONTAL AIR BAGS FAILED TO DEPLOY DURING THE CRASH. BODY SHOP STATED THAT AIR BAGS SHOULD HAVE DEPLOYED DUE TO DAMAGE VEHICLE RECEIVED. DEALERSHIP HAS NOT EXAMINED VEHICLE TO DETERMINE IF THERE WAS A PROBLEM WITH THE AIR BAG SYSTEM. PLEASE PROVIDE ANY ADDITIONAL INFORMATION / DOCUMENTATION.**AK
8010014	CHEVROLET	TRAILBLAZER	2002	2002-04-08	CONSUMER STATES THAT DURING A VEHICLE CRASH THE SIDE AIRBAG DID NOT DEPLOY.*JB
8022437	CHEVROLET	TRAILBLAZER	2002	2002-11-01	WHILE TRAVELING ABOUT 40MPH THE VEHICLE WAS INVOLVED WITH A FRONTAL COLLISION. NEITHER AIRBAG DEPLOY PLEASE PROVIDE ADDITIONAL INFORMATION. DEALER IS AWARE OF THE PROBLEM. TS
10011300	CHEVROLET	TRAILBLAZER	2002	2003-03-04	THE VEHICLE WAS INVOLVED IN A COLLISION, AND THE AIR BAGS DID NOT DEPLOY.*JB
10013828	CHEVROLET	TRAILBLAZER	2002	2003-03-19	HYDROPLANED HEAD ON INTO A TREE DOING ABOUT 40 MPH. HIT THE TREE HARD ENOUGH TO BREAK THE ENGINE MOUNTS AND SHIFT THE ENGINE FORWARD INTO THE FAN, PLUS SOME TRANSMISSION DAMAGE. THE AIR BAGS DID NOT DEPLOY. *NLM

10014453	CHEVROLET	TRAILBLAZER	2002	2003-02-05	ON FEB 5TH, 2003 I REAR ENDED A STOPPED VEHICLE WHILE GOING 45 MILES AN HOUR. MY CHIN HIT THE STEERING WHEEL BUT NO AIRBAG DEPLOYED. THE BODY SHOP WAS UNABLE TO DETERMINE WHY THE AIR BAG DID NOT DEPLOY. *NLM
10015367	CHEVROLET	TRAILBLAZER	2002	2003-04-02	CONSUMER WAS HIT TWICE IN A SIDE AND FRONTAL COLLISION WHILE TRAVELING APPROXIMATELY 30MPH. NEITHER THE FRONTAL OR SIDE AIR BAGS DEPLOYED. *NLM
10027280	CHEVROLET	TRAILBLAZER	2002	2003-07-12	THE VEHICLE WAS INVOLVED IN A COLLISION, AND THE AIR BAGS FAILED TO DEPLOY. *AK THE CONSUMER SUFFERED INJURIES. *JB
10044550	CHEVROLET	TRAILBLAZER	2002		WHILE CONSUMER WAS DRIVING 25-28 MPH VEHICLE WAS T-BONED FROM ANOTHER VEHICLE AT ESTIMATED SPEED OF 30 MPH. UPON IMPACT, FRONTAL AIR BAGS FAILED TO DEPLOY. *AK
10113109	CHEVROLET	TRAILBLAZER	2002	2004-12-12	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WHILE DRIVING BETWEEN 50-55MPH. UPON IMPACT, THE AIR BAGS FAILED TO DEPLOY. AS A RESULT, DRIVER SUSTAINED CHEST INJURIES WHEN IT IMPACTED THE STEERING WHEEL.*AK
10114818	CHEVROLET	TRAILBLAZER	2002	2005-03-24	CRASH AT 35 MPH (FRONT END SQUARE) DRIVER AND PASSENGER AIR BAGS FAILED TO DEPLOY.
10115232	CHEVROLET	TRAILBLAZER	2002	2005-02-09	DURING A 30 MPH VEHICLE FRONTAL COLLISION FRONT AIR BAGS DID NOT DEPLOY. CONSUMER SUSTAINED MINOR INJURIES. THE VEHICLE WAS TOWED. DEALERSHIP WAS NOTIFIED, BUT DID NOT RESOLVE THE PROBLEM. *AK...PROBLEM WAS DISCUSSED WITH THE DEALER IN DETAIL BUT DID NOT KNOW HOW TO RESOLVE PROBLEM. *AK
10118790	CHEVROLET	TRAILBLAZER	2002	2005-04-22	WHILE DRIVING 55-60 MPH, VEHICLE HIT AN SUV THAT DROVE INTO LANE. VEHICLE THEN HIT BY TRACTOR TRAILER. VEHICLE CRASHED WITH GREAT FORCE INTO HIGHWAY DIVIDER AND LOST FRONT LEFT WHEEL, CAUSING VEHICLE TO CONTINUE TO CRASH ALONG DIVIDER. BOTH FRONT AIRBAGS AND BOTH SIDE AIRBAGS FAILED TO DEPLOY. PASSENGER IN VEHICLE SUSTAINED FRACTURES TO ORBITAL BONES AND MAXILLARY BONE IN SKULL. MAJOR RECONSTRUCTIVE SURGERY WAS REQUIRED. THE VEHICLE WAS DETERMINED TO BE A TOTAL LOSS.
10122088	CHEVROLET	TRAILBLAZER	2002	2005-05-24	DT: AIR BAG DID NOT DEPLOY IN A OFF CENTER FRONTAL COLLISION. WHILE TRAVELING ABOUT 35-40 MPH CONSUMER'S VEHICLE HIT THE REAR OF ANOTHER VEHICLE. IT WAS AT A GARAGE NEAR THE ACCIDENT SITE. NO ONE LOOKED AT THE VEHICLE BUT THE RESCUE SERVICES WERE SURPRISED THAT THE AIRBAGS DID NOT DEPLOY. INTERMITTENTLY THE SRS LIGHT WOULD COME ON. TOOK VEHICLE TO DEALER AND IT WAS REPAIRED IN JULY 2004. *AK *JB
10136929	CHEVROLET	TRAILBLAZER	2002	2005-09-15	DT: CONSUMER'S VEHICLE WAS INVOLVED IN AN ACCIDENT ON SEPTEMBER 15, 2005. UPON IMPACT, NONE OF THE AIR BAGS DEPLOYED. BACK IN SEPTEMBER OF 2002 CONSUMER'S WAS INVOLVED IN A HEAD ON COLLISION WITH THIS SAME VEHICLE, AND THE AIR BAGS NEVER DEPLOYED AT THAT TIME EITHER. HAD THE VEHICLE REPAIRED AT THE GMC DEALERSHIP. *AK
10144322	CHEVROLET	TRAILBLAZER	2002	2005-11-08	DT: THE CONTACT STATED VEHICLE WENT OFF THE ROAD AND HIT TREES AT 50-55 MPH. UPON IMPACT, THE AIRBAGS DID NOT DEPLOY. THE VEHICLE WAS TOTALED. THE FRONT END COLLAPSED, THE ENGINE WAS IN THE FIREWALL, AND THE BODY WAS PUSHED OFF OF THE FRAME. THE CONTACT SUSTAINED MINOR BRUISES AND ABRASIONS. A POLICE REPORT WAS TAKEN AT THE SCENE. THE DEALERSHIP STATED THEY HAVE NEVER HEARD OF THIS HAPPENING. *AK
10157599	CHEVROLET	TRAILBLAZER	2002	2006-05-15	DT*: THE CONTACT STATED WHILE TRAVELING 35 MPH WITH PRIOR BRAKING, THE VEHICLE VEERED OFF THE ROAD AND SLID INTO A DITCH. THERE WAS FRONT END DAMAGE; THE FRAME RAIL AND HOOD BENT. THE AIRBAGS DID NOT DEPLOY WHEN THIS OCCURRED. THE CONTACT WAS NOT IN THE VEHICLE AND THE DRIVER WAS UNAWARE OF WHAT CAUSED THE VEHICLE TO VEER OFF THE ROAD. THE DRIVER SUSTAINED HEAD TRAUMA AND THE SEAT BELT WAS NOT WORN. THERE WAS A POLICE REPORT TAKEN AT THE SCENE. THE VEHICLE WAS TOWED TO AN INDEPENDENT REPAIR SHOP, BUT HAS NOT BEEN INSPECTED BY A MECHANIC. UPDATED 06/16/06. *JB
10172513	CHEVROLET	TRAILBLAZER	2002	2006-07-01	DT*: THE CONTACT STATED WHILE DRIVING 40 MPH ON A GRAVEL ROAD, CONTROL OF THE VEHICLE WAS LOST AND IT CRASHED INTO A TREE HEAD ON. THE AIR BAGS DID NOT DEPLOY. THERE WAS NO PRIOR BRAKING AND SEAT BELTS WERE WORN. THE DRIVER SUSTAINED MINOR INJURIES. THE VEHICLE WAS LATER TOWED TO AN INDEPENDENT REPAIR SHOP. THE DEALER WAS ALERTED.
10254230	CHEVROLET	TRAILBLAZER	2002	2009-01-08	TL*THE CONTACT OWNS A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 15 MPH, THE CONTACT STRUCK A PATCH OF ICE AND THE VEHICLE CRASHED INTO A LIGHT POLE. THE VEHICLE WAS COMPLETELY DESTROYED AND NONE OF THE AIR BAGS DEPLOYED. A POLICE REPORT WAS FILED AND THERE WERE NO INJURIES. THE FAILURE AND CURRENT MILEAGES WERE 56,000.

10257808	CHEVROLET	TRAILBLAZER	2002	2009-01-21	WELL SERVICED 90K MILES. TRAVELING AT 35MPH PUSHED BREAKS ALL THE WAY DOWN (FRACTURING RIGHT ANKLE) SLOWED ME DOWN BUT FAILED TO STOP AT UPCOMING RED LIGHT. STRUCK MEDIUM SIZE VEHICLE INJURING OTHER DRIVER AND CAUSING CONSIDERABLE DAMAGE TO BOTH VEHICLES. CHEVY DEALER COLLISION/SERVICE CENTER ESTIMATED \$8K IN REPAIRS. IN OTHER WORDS IT COSTS MORE TO REPAIR IT THAN WHAT THE VEHICLE IS WORTH. ALSO:"MASTER CYLINDER IS BAD" AND AIR BAGS DID NOT DEPLOY. CHEVY TECH. SAID "IMPACT WAS NOT BIG ENOUGH" . AFTER READING SOME EIGHT OTHER COMPLAINTS VERY SIMILAR TO THIS . I AM CONCERNED ABOUT DRIVING THIS OR GETTING INTO ANOTHER ONE. IS THERE NOT A BREAK LIGHT SERVICE SENSOR THAT I SHOULD HAVE NOTED.? SERVICE MANUAL FOR SCHEDULED MAINTENANCE SAYS TO CHECK FRONT AND REAR AXLE FLUID AND ADD FLUID AS NEEDED EVERY 5K TO 7K MILES AFTER 67.5K MILES. *TR
10263896	CHEVROLET	TRAILBLAZER	2002	2009-03-26	I WAS IN A CAR ACCIDENT, WHERE I WAS TRAVELING AT ABOUT 35 MPH. AN AGGRESSIVE DRIVER SPEED AROUND ME AND CUT ME OFF AND THAN STOMPED ON THIS BRAKES IN FRONT OF ME. DUE TO THAT I SWERVED TO MISS HIM CLIPPING HIS RIGHT BACK LIGHT AD BUMPER WITH MY LEFT HEADLIGHT AND BUMPER. AS I WAS SWERVING I HIT A TREE JUST ABOUT DEAD ON WITH MY AR. THE MAJORITY OF THE IMPACT OCCURRED JUST ABOUT 6 INCHES TO THE LEFT (IF LOOKING AT THE CAR) OF THE CENTER OF THE FRONT OF THE CAR. I HIT THE TREE AT A SPEED OF ABOUT 28-30 MPH. AFTER INITIAL IMPACT I WAS RUSHED TO THE HOSPITAL DUE TO UNCONSCIOUS AND FACIAL CONTUSIONS. DURING THE FIRST MOMENTS AFTER THE ACCIDENT, ONE OF THE FIRST THINGS OFFICERS, EMTS AND WITNESSES SAID WAS "I CAN'T BELIEVE THE AIRBAGS DIDN'T GO OFF". IN THE RECENT DAYS AFTER THE ACCIDENT I HAVE HAD SEVERAL MECHANICS AND SUCH APPRAISE THE CAR, THE ONE COMMON THEME THEY ALL SHARE IS THAT THEY SUSPECT THERE MIGHT NOT BE AN AIRBAG WHERE IT BELONGS. OR THE LACK THERE OF. *TR
10294686	CHEVROLET	TRAILBLAZER	2002	2009-11-20	HIT HEAD ON BY ANOTHER CAR TOTALING MY CAR, AIRBAGS DID NOT DEPLOY. *TR
10314643	CHEVROLET	TRAILBLAZER	2002	2010-01-07	INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6) I WAS TRAVELING SOUTHBOUND ON KY HWY 1531 (EASTWOOD FISHERVILLE RD). WHEN I APPROACHED A SHARP CURVE IN THE ROADWAY, I OBSERVED A HONDA ODYSSEY MINIVAN TRAVELING NORTHBOUND TOO FAST FOR THE ICY, SNOWY ROAD CONDITIONS. THE MINIVAN DRIVER LOST CONTROL OF HER VEHICLE AND STRUCK MY 2002 TRAILBLAZER HEAD-ON IN THE SOUTHBOUND LANE. AT THE TIME OF IMPACT, MY TRAILBLAZER WAS COMPLETELY STOPPED WITH MY RIGHT FOOT PRESSED FIRMLY ON THE BRAKE PEDAL. THE HONDA ODYSSEY AIRBAGS FULLY DEPLOYED. MY TRAILBLAZERS AIRBAGS DID NOT DEPLOY. BOTH VEHICLES WERE TOTAL LOSS. MY TRAILBLAZER WAS TOWED TO GM REPAIR SHOP BAUCHMAN CHEVROLET IN LOUISVILLE KY. IT REMAINS STORED IN ITS ORIGINAL POST-ACCIDENT CONDITION. I HAVE RETAINED OWNERSHIP TITLE OF THIS VEHICLE. GM REPAIR SHOP NOTED EXTENSIVE FRAME DAMAGE AND BROKEN AIRBAG SENSOR. THIS IS THE SECOND FRONT END INJURY CRASH INVOLVING THIS TRAILBLAZER WHERE THE AIRBAGS FAILED TO DEPLOY. SEE ALSO ODI CASE # 10314629. GM WAS NOTIFIED OF INCIDENT AND AGAIN I OPENED AN INVESTIGATION WITH GM AS TO WHY THE AIRBAGS FAILED TO DEPLOY. AS OF THIS DATE (2/26/2010) GM INVESTIGATORS HAVE NOT INSPECTED THE VEHICLE. (GM CASE [XXX]). I SUFFERED LOW BACK INJURIES AS A RESULT OF THIS ACCIDENT. THIS INJURY OCCURRED 8 WEEKS AFTER SPINAL FUSION SURGERY. I HAVE BEEN IN PHYSICAL THERAPY SINCE THE ACCIDENT FOR JOINT DAMAGE IN THE SACRAL ILLIUM AREA. *TR
10343917	CHEVROLET	TRAILBLAZER	2002	2009-12-04	TL*THE CONTACT OWNS A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 70 MPH THE VEHICLE WAS INVOLVED IN A CRASH IN WHICH THE AIR BAGS DID NOT DEPLOY. A POLICE REPORT WAS FILED. THE CONTACT WAS INJURED. THE VEHICLE WAS DESTROYED AND TOWED TO AN INDEPENDENT REPAIR SHOP. THE MANUFACTURER EXAMINED THE VEHICLE BUT DID NOT INFORM THE CONTACT OF THE CAUSE OF FAILURE; HOWEVER, THEY DID OFFER HIM A SETTLEMENT. THE FAILURE AND CURRENT MILEAGES WERE 150,000. THE VIN WAS UNAVAILABLE.
10378297	CHEVROLET	TRAILBLAZER	2002	2011-01-19	AIRBAGS DIDN'T DEPOLY AND ROOF CAVED. *TR
10386658	CHEVROLET	TRAILBLAZER	2002	2007-03-06	TL* THE CONTACT OWNS A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 70 MPH IN RAINY WEATHER, THE CONTACT DROVE OVER A PUDDLE OF WATER AND LOST CONTROL OF THE VEHICLE. SHE THEN ENGAGED THE BRAKES AND THE VEHICLE SWERVED ABNORMALLY. THE VEHICLE SPUN AROUND AND CRASHED INTO THE OUTER MEDIAN. THE AIR BAGS DID NOT DEPLOY AND THE CONTACT SUSTAINED A SHOULDER INJURY. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE APPROXIMATE FAILURE MILEAGE WAS 152,000.
10587773	CHEVROLET	TRAILBLAZER	2002	2014-05-10	I WAS DRIVING AND A GUY IN A CAR CAME OVER IN MY LANE AND HIT ME HEAD ON CAUSING ME TO FLIP MY VEHICLE 4 TIMES, MY AIRBAGS DIDN'T COME OUT AND THE GUY THAT HIT ME WAS UNDER THE INFLUENCE, MY VEHICLE WAS TOTALED. *TR

10626676	CHEVROLET	TRAILBLAZER	2002	2008-03-10	I STRUCK A VEHICLE THAT BROADSIDE WHEN HE RAN A STOP SIGN. I WAS GOING APPROXIMATELY 30 TO 35 MPH WHEN I STRUCK HIS VEHICLE. THE AIR BAGS DID NOT DEPLOY. I WAS TAKEN AWAY IN AN AMBULANCE AND HAD DAMAGE TO MY CERVICAL SPINE, STOMACH AND MID SPINE. I DID INQUIRE WHERE I HAD THE VEHICLE REPAIRED, ABOUT \$8K IN DAMAGES, ABOUT WHY THE AIRBAGS DIDN'T DEPLOY. THEY SAID THEY DIDN'T KNOW BUT CHECKED AND SAID THE AIRBAG SYSTEM WAS FUNCTIONING? I SEE MANY SUCH "STORIES" ABOUT TRAILBLAZER AIRBAGS NOT DEPLOYING ON THIS SITE. IT REALLY BE NICE TO SEE SOMETHING DONE ABOUT THIS SITUATION. THIS VEHICLE HAS BEEN IN SEVERAL WRECKS AND THE AIRBAGS HAVE NEVER DEPLOYED!!!! NOTE, I HAVE WRITTEN TO CHEVROLET/GM ABOUT THIS ISSUE BUT DON'T REALLY EXPECT THEM TO RESPOND! SOME SUPPORT FROM THE NHTSA WOULD REALLY BE APPRECIATED AND IS NEEDED BEFORE ANYONE ELSE GET HURT WHEN THE AIRBAGS DON'T DEPLOY! *TR
10758946	CHEVROLET	TRAILBLAZER	2002	2014-10-15	TL* THE CONTACT OWNED A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 15 MPH ON A RAINY ROAD, THE CONTACT CRASHED INTO ANOTHER VEHICLE AND THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED A HEAD INJURY THAT REQUIRED MEDICAL ATTENTION. THE DRIVER AND PASSENGER OF THE OTHER VEHICLE SUSTAINED UNKNOWN INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE AND VIN WERE UNAVAILABLE.
10761168	CHEVROLET	TRAILBLAZER	2002	2014-10-04	TL* THE CONTACT OWNS A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 10 MPH ON AN INCLINE DURING INCLEMENT WEATHER CONDITIONS, THE CONTACT'S VEHICLE VEERED INTO ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE MANUFACTURER WAS NOT MADE AWARE OF THE ISSUE. A POLICE REPORT WAS FILED. THE CONTACT SUFFERED A HEAD CONCUSSION THAT REQUIRED MEDICAL ATTENTION. THE FAILURE MILEAGE WAS NOT PROVIDED.
10825823	CHEVROLET	TRAILBLAZER	2002	2016-01-09	THE VEHICLE WAS INVOLVED IN A HEAD ON CRASH INTO A TELEPHONE POLE AND THE AIR BAGS DID NOT DEPLOY. THE FRONT SEAT PASSENGER WAS INJURED AND THE DRIVER STRUCK THE STEERING WHEEL AND DIED AT THE HOSPITAL FROM INTERNAL INJURIES. WE ARE TRYING TO DETERMINE WHY THE AIRBAGS DID NOT DEPLOY. THE PASSENGER WAS NOT WEARING A SEAT BELT AND IT ALSO APPEARS THAT THE DECEASED DRIVER WAS NOT WEARING A SEAT BELT.
10872510	CHEVROLET	TRAILBLAZER	2002	2016-05-26	DRIVING APPROXIMATELY 30 MILES PER HOUR, WOMAN PULLED OUT IN FRONT OF ME TO TURN ONTO THE FREEWAY. A VEHICLE NEXT TO ME HONKED THEIR HORN AND MISSED HITTING HER BUT I HIT HER ON THE PASSENGER REAR PANEL OF HER CAR, DAMAGING HER VEHICLE AND BENDING THE REAR TIRE AT AN ANGLE. THE AIRBAG DID NOT DEPLOY AND WAS ON. I WAS TRAVELING ON A CITY STREET, GOING WESTBOUND, THE OTHER DRIVER WAS TURNING TO GO NORTHBOUND.
10899776	CHEVROLET	TRAILBLAZER	2002	2016-08-29	TL* THE CONTACT OWNS A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 25 MPH, THE CONTACT'S VEHICLE CRASHED INTO A BUS AND SUSTAINED SIGNIFICANT DAMAGE TO THE FRONT END. THE AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS TOWED. THE DRIVER SUSTAINED INJURIES TO THE NECK, HEAD, TORSO, AND A DISLOCATED FINGER. MEDICAL ATTENTION WAS REQUIRED. A POLICE REPORT WAS FILED. THE CAUSE OF THE FAILURE WAS NOT DIAGNOSED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 122,000.
10957467	CHEVROLET	TRAILBLAZER	2002	2017-02-26	MY WIFE WAS IN A HEAD ON COLLISION WHERE SHE HIT A TREE GOING APPROXIMATELY 45 MILES AN HOUR. SHE WAS ON A COUNTY ROAD AND LOST CONTROL OF THE VEHICLE, HITTING THE TREE ON PRIVATE PROPERTY. THE AIRBAGS DID NOT DEPLOY, WHEN THEY SHOULD HAVE. SHE HIT HER HEAD ON THE STEERING WHEEL AT IMPACT. I HAVE UPLOADED PICTURES OF THE DAMAGE TO THE VEHICLE AND A PICTURE SHOWING THE AIRBAGS DID NOT DEPLOY.
11042967	CHEVROLET	TRAILBLAZER	2002	2016-11-22	TL* THE CONTACT OWNED A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING APPROXIMATELY 60 MPH, THE CONTACT SWERVED TO AVOID ANOTHER VEHICLE AND CRASHED INTO A MEDIAN FACING ONCOMING TRAFFIC. THE VEHICLE FLIPPED OVER EIGHT TIMES AND LANDED IN A DITCH ON THE OPPOSITE SIDE OF THE HIGHWAY. THE AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS TOWED AND DEEMED TOTALED. A POLICE REPORT WAS FILED. THE CONTACT PASSED OUT AND RECEIVED INJURIES TO THE HEAD, NECK, BACK, AND SHOULDER. MEDICAL ATTENTION WAS REQUIRED. THE DEALER WAS NOT CONTACTED. THE VEHICLE WAS INCLUDED IN NHTSA CAMPAIGN NUMBER: 04V201000 (SEAT BELTS). THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 100,000.

11289369	CHEVROLET	TRAILBLAZER	2002	2019-11-29	TL* THE CONTACT OWNED A 2002 CHEVROLET TRAILBLAZER. WHILE DRIVING AND TURNING, THE VEHICLE HYDROPLANED AND STRUCK A CONCRETE WALL HEAD ON. THE VEHICLE THEN VEERED TO THE LEFT AND STRUCK THE CENTER DIVIDER TWICE. THE AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS TOTALED AND TOWED. MOST OF THE DAMAGE WAS TO THE FRONT END OF THE VEHICLE AND THE DRIVER'S DOOR COULD NOT BE CLOSED. THE DRIVER SUSTAINED BRUISES WHERE THE SEAT WAS LOCATED. THE DRIVER WAS TRANSPORTED TO THE EMERGENCY ROOM FOR MEDICAL ATTENTION. THE DRIVER'S FACE WAS BRUISED AND A CAT SCAN WAS PERFORMED TO DETERMINE IF THERE WERE ANY BROKEN BONES, BUT THE TESTS WERE NEGATIVE. THE DRIVER ALSO TWISTED HER ANKLE AND THERE WAS A LITTLE BIT OF SWELLING ON HER KNEE. A POLICE REPORT WAS FILED. THE MANUFACTURER WANTED TO VISIT THE CONTACT'S HOME TO EXAMINE THE VEHICLE AND FIND OUT WHY THE AIR BAGS DID NOT DEPLOY. THE DEALER WAS NOT CONTACTED. THE CAUSE OF THE FAILURE WAS NOT DETERMINED. THE FAILURE MILEAGE WAS UNKNOWN.
564451	GMC	ENVOY	2002	2001-01-13	WHILE DRIVING IN INCLEMENT WEATHER THE DRIVERS VEHICLE HIT A PATCH OF BLACK ICE SENDING THE VEHICLE OFF THE ROAD HITTING A STONE RETAINING WALL HEAD ON, NEITHER PASSENGER NOR DRIVERS SIDE AIR BAGS DEPLOYED. NLM
566612	GMC	ENVOY	2002	2002-01-14	ALL OF THE EIGHT (8) AIR BAG EQUIPPED IN THE VEHICLE FAILED TO DEPLOY DURING FRONTAL IMPACT, ALTHOUGHT PROPERLY RESTRAINED THE CONSUMER STILL SUSTAINED SERIOUS INTERNAL INJURIES, INCLUDING A LACERATED LIVER.(ATTORNEY ON BEHALF OF CLIENT) NLM
8016732	GMC	ENVOY	2002	2002-07-17	VEHICLE WAS INVOLVED IN FRONTAL COLLISION WITH POINT OF IMPACT JUST A LITTLE LEFT OF THE CENTER BUMPER. FRONT END, INCLUDING FRAME WAS TOTALED. UPON IMPACT, NEITHER AIR BAGS DEPLOYED. PLEASE DESCRIBE DETAILS. *AK
8023505	GMC	ENVOY	2002	2002-11-22	CONSUMER COLLIDED IN THE REAR OF A TRACTOR TRAILER TRAVELLING APPROXIMATELY 60-70MPH. BOTH THE DRIVER AND PASSENGER AIR BAGS DID NOT DEPLOY. TS
10002513	GMC	ENVOY	2002		WHILE TRAVELING AT 70 MPH ANOTHER VEHICLE WAS TRAVELING EAST BOUND CROSSED CONSUMERS PATH UNEXPECTEDLY, CAUSING CONSUMER TO HIT A TREE. CONSUMER STATES NONE OF THE AIRBAGS DEPLOYED. PLEASE PROVIDE ANY FURTHER INFORMATION.*JB
10009390	GMC	ENVOY	2002	2003-02-21	CONSUMER LOST CONTROL OF VEHICLE AND HIT A LEDGE, AND NONE OF THE AIR BAGS DEPLOYED. *JB THE DEALER STATED THAT IF THE VEHICLE HIT 6 INCHES TO THE RIGHT, THEN THE AIR BAGS WOULD HAVE DEPLOYED. *SCC
10029726	GMC	ENVOY	2002	2003-07-03	WHILE DRIVING 50 MPH VEHICLE WAS INVOLVED IN A FRONTAL COLLISION, BUT AIR BAGS DID NOT DEPLOY. DEALER NOTIFIED.*AK
10029894	GMC	ENVOY	2002	2003-07-15	CONSUMER STATED WHILE SHE AND HER HUSBAND WERE TRAVELING ON THE HIGHWAY AT APPROXIMATELY 40-50 MPH, THE VEHICLE IN FRONT OF THEM DECIDED TO MAKE A QUICK TURN, WHICH CAUSED HER HUSBAND TO HIT THE VEHICLE IN THE SIDE. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. BOTH SHE AND HER HUSBAND SUSTAINED INJURIES. HIS KNEES WENT INTO THE DASH AND HE WAS SORE FROM HEAD TO TOE. THIS IMPACT CAUSED HER HEAD TO SNAP BACK, RESULTING IN A CHEST WALL INJURY/A STIFF NECK, AND BACK. THIS WAS A MALFUNCTION BECAUSE THE AIR BAGS SHOULD HAVE DEPLOYED BECAUSE OF THE RATE OF SPEED. *AK *CB THE CONSUMER ALSO FELT THE SEAT BELT DID NOT REALLY PERFORM AS DESIGNED. *JB
10063773	GMC	ENVOY	2002	2004-03-21	2002 GMC ENVOY SER#[XXX] AIR BAGS DID NOT DEPLOY DRIVER TAKEN BY LIFESTAR TO HARTFORD HOSPITAL THE WHOLE LEFT SIDE OF THE VEHICLE WAS CAVED IN ALL THE WAY TO THE FRONT SEAT. *NM UPDATED 07/30/2012 *JS INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)
10075683	GMC	ENVOY	2002	2004-05-14	WHILE DRIVING 30 MPH, THE CONSUMER WAS INVOLVED IN AN EIGHT VEHICLE PILE UP. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. AS A RESULT, THE DRIVER SUSTAINED SEVERE BACK AND LEG INJURIES. *AK *SC
10079342	GMC	ENVOY	2002	2004-06-16	WHILE DRIVING 55 MPH DRIVER APPLIED THE BRAKES TO SLOW DOWN THE SPEED AND CONSUMER LOST CONTROL, CAUSING THE VEHICLE TO HIT A GUARD RAIL AND ROLL OVER THREE TIMES. VEHICLE LANDED UPSIDE DOWN. UPON IMPACT, THE AIRBAG DID NOT DEPLOY, AND SEAT BELT DID NOT HOLD THE PASSENGER. *AK
10099326	GMC	ENVOY	2002	2004-11-01	AFTER BEING STRUCK HEAD ON BY A SEMI TRAILER AT 40 MPH AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS TOTALED.*AK
10101068	GMC	ENVOY	2002	2004-11-11	WHILE DRIVING 20 MPH CONSUMER'S VEHICLE COLLIDED WITH THE VEHICLE IN FRONT. UPON IMPACT, BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. DRIVER TO SUSTAINED MINOR INJURIES, AND WAS TRANSPORTED TO A HOSPITAL. THE VEHICLE WAS TOWED TO THE DEALER FOR INSPECTION. *AK
10129259	GMC	ENVOY	2002	2005-07-18	I WAS TRAVELLING AT APPROXIMATELY 35MPH AND AS I WAS HEADING TOWARD A SIGNAL LIGHT WHEN A VAN TURNED LEFT IN THE OPPOSITE DIRECTION OF TRAVEL. MY VEHICLE'S FRONT END STRUCK THE VAN'S PASSENGER SIDE DOOR. AIR BAGS DID NOT DEPLOY UPON IMPACT ALTHOUGH VAN'S BOTH FRONTAL AIR BAGS DID DEPLOY.MY FACE HIT THE STEERING WHEEL AND KNEES HIT THE BOTTOM OF THE DASHBOARD. PASSENGER WAS ALSO BRUISED ON KNEES

10211793	GMC	ENVOY	2002	2007-12-05	TL*THE CONTACT OWNS A 2002 GMC ENVOY. WHILE DRIVING 20 MPH UPHILL IN ICY WEATHER, THE VEHICLE SLID OFF THE ROAD. NONE OF THE AIR BAGS DEPLOYED AND THE VEHICLE WAS COMPLETELY DESTROYED. THE PASSENGER WAS SEVERELY INJURED. THE CONTACT FILED A FORMAL COMPLAINT WITH THE MANUFACTURER. HE HAS A COPY OF THE POLICE REPORT. THE CURRENT AND FAILURE MILEAGES WERE 115,000. UPDATED 01/07/08 *BF UPDATED *JB
10246849	GMC	ENVOY	2002	2008-10-03	MY WIFE AND I WERE HEADED SOUTHBOUND ON 685 IN ROUND ROCK, TX IN OUR 2002 GMC ENVOY AT APPROX. 9:35 PM WHEN A DRIVER IN A MINI VAN RAN A RED LIGHT AT THE INTERSECTION OF 685 AND GATTIS SCHOOL RD. OUR VEHICLE STRUCK THEM IN THE REAR PASSENGER QUADRANT. THE SPEED LIMIT IS 60 MPH AT THIS INTERSECTION AND WE DID NOT HAVE TIME TO BRAKE. EVEN THOUGH THE FRONT OF OUR VEHICLE WAS CRUSHED INTO THE ENGINE COMPARTMENT, NO AIRBAGS DEPLOYED. MY WIFE, WHO IS IN THE HABIT OF WEARING HER SEATBELT (ALTHOUGH WE STILL CANNOT CONFIRM ONE WAY OR THE OTHER) STRUCK THE REAR VIEW MIRROR WITH HER HEAD WITH ENOUGH FORCE TO BREAK A HOLE IN THE WINDSHIELD WHERE IT WAS ATTACHED AND BREAK THE WINDSHIELD AROUND IT. SHE WAS TRANSPORTED TO THE HOSPITAL WITH A CONCUSSION AND HAD FOR A TIME GONE INCOHERENT AND UNRESPONSIVE WITH SHORT TERM MEMORY LOSS. SHE HAS HAD DAILY HEADACHES SINCE WITH SOME EXTREMELY SEVERE. SHE ALSO HAD MULTIPLE SEVERE CONTUSIONS DOWN HER LEFT SIDE, PARTICULARLY IN HER UPPER LEFT THIGH WITH A LARGE HEMOTOMA THAT IS STILL GIVING HER PROBLEMS. OUR VEHICLE WAS SUBSEQUENTLY TOTALED BY THE INSURANCE COMPANIES. WE HAVE CONTACTED GM ABOUT THE FAILURE OF THE AIRBAGS TO DEPLOY AND THEY ARE CURRENTLY INVESTIGATING AND SENT AN INVESTIGATOR TO DOWNLOAD THE COMPUTER INFORMATION LAST WEEK. THERE IS A POLICE REPORT THAT WAS FILED BY THE TEXAS DPS INVESTIGATING OFFICER. *TR
10437615	GMC	ENVOY	2002	2011-11-16	CAR HAD A HEAD ON COLLISION WITH ANOTHER CAR THAT JUMP FROM THE OPPOSITE TRAFFIC. BOTH CARS WERE TOTALED BECAUSE OF THIS ACCIDENT, BUT MY AIRBAGS DID NOT DEPLOY AT THE TIME OF THE ACCIDENT. *KB
10667172	GMC	ENVOY	2002	2013-07-07	MY SON (17) WAS COMING HOME AND CRASHED INTO A LIGHT POLE, WE DON'T KNOW WHAT CAUSED HIM TO CRASH NO ALCOHOL OR DRUGS WERE INVOLVED AND THE AIRBAGS DID NOT DEPLOY...HE WAS TRAPPED IN THE CAR AND DIED FROM BLUNT FORCE TRAUMA TO THE HEAD. *TR
10723011	GMC	ENVOY	2002	2014-06-28	I AND MY PASSENGER WERE IN AN ACCIDENT ABOUT A YEAR AGO, A VERY HARD FRONT END IMPACT, AND NONE OF THE AIR BAGS DEPLOYED. WE WERE BOTH TRANSPORTED TO THE ER BY AMBULANCE, I HIT THE STEERING WHEEL HARD SO HARD THAT IT BENT INWARDS AND BROKE MY NOSE ALSO HAD A CONCUSSION. HE WAS IN THE FRONT PASSENGER SEAT AND HIT THE FRONT DASH, WHERE THE AIR BAG SHOULD HAVE DEPLOYED, HE BROKE HIS FRONT TEETH AND ALSO HAD A CONCUSSION. I'VE ALSO HAD MANY OF THE SAME ISSUES THAT EVERY OTHER 02 OR 03 ENVOY HAS YET MY VIN PULLS NO RECALLS. THIS NEEDS TO BE INVESTIGATED!!!! THANKS.
11179980	GMC	ENVOY	2002	2019-02-12	I WAS ON MY WAY HOME ON HWY/US 151 GOING APPROX. 55-60 MPH (65 MPH ZONE) WHEN I HIT A DEER WHICH CAUSED MY VEHICLE TO LOSE CONTROL AND SLAMMED INTO THE START OF A GUARDRAIL AT NO LESS THAN 45 MPH BRINGING MY 2002 GMC ENVOY TO A COMPLETE STOP, AT MOST 2-3 FEET FROM INITIAL IMPACT TO BE EXACT. THE AIRBAGS DID NOT DEPLOY. FRONT DASH NOR SIDE IMPACT BAGS, NOTHING. N I HIT HARD. LUCKILY I WASNT SERIOUSLY INJURED ONLY MINOR BRUISING AND QUITE SORE FROM WHIPLASH AND BEING THROWN INTO THE DOOR AN A BIT SHAKEN N LUCKILY HAD NO PASSENGERS. AS FOR MY ENVOY, IT IS A TOTAL LOSS AND UNFORTUNATELY I ONLY HAD LIABILITY INSURANCE SO NOW IM SCREWED WITHOUT A VEHICLE AND AFTER ALL OTHER PROBLEMS IVE FACED WITH MY GMC ENVOY I WILL NEVER OWN A GM AGAIN. TAKE GM PRODUCTS TO THE DUMP.
8021614	GMC	YUKON	2002	2002-10-13	CONSUMER STATES THAT AT 50 MPH UNDER RAINY CONDITIONS, CONSUMER LOSS CONTROL OF VEHICLE AND HIT A TREE. VEHICLE WAS TOTALED. NONE OF THE VEHICLES AIRBAGS DEPLOYED. PLEASE PROVIDE ANY FURTHER INFORMATION. TS
10004394	GMC	YUKON	2002	2002-12-09	WHILE DRIVING AT 25 MPH THE VEHICLE WAS INVOLVED IN AN ACCIDENT WHERE AIRBAGS DID NOT DEPLOY. DEALER NOTIFIED. PLEASE PROVIDE ADDITIONAL INFORMATION. TS
10126105	GMC	YUKON	2002	2005-06-13	DT: CONSUMER GOT IN AN ACCIDENT AND TOTALED THE VEHICLE, THE FRONT AND SIDE AIR BAGS NEVER DEPLOYED. CONSUMER WAS GOING ABOUT 70 MPH AND HIT HEAD ON AND THE VEHICLE ROLLED 4 TIMES. *AK *SB
10132894	GMC	YUKON	2002	2005-07-15	DT: WHILE DRIVING DOWN THE MAIN ROAD AT 45 MPH, THE CONSUMER TOOK HIS EYES OFF THE ROAD AND WENT INTO THE GRAVEL AND THEN INTO A DITCH AND HIT A MAILBOX. THE CONSUMER WENT THROUGH THE PASSENGER SIDE WINDSHIELD. THE RIGHT WHEEL FELL OFF AND THE FRONT BUMPER SMASHED INTO THE ENGINE AND THE FRAME WAS BENT. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THE VEHICLE WAS EQUIPPED WITH FRONT AND SIDE AIR BAGS. THE AIR BAG LIGHT WAS NOT ON AND NEVER HAD BEEN ON. THERE WERE NO PROBLEMS WITH VEHICLE BEFORE THIS INCIDENT. THERE WERE NO OTHER VEHICLES INVOLVED. THE VEHICLE HAS NEVER BEEN IN AN ACCIDENT THERE WERE NO RECALLS ON THE AIR BAGS. THE MANUFACTURER HAS NOT BEEN CONTACTED, BUT WILL BE CONTACTED TODAY.THERE WAS A POLICE REPORT WAS TAKEN. *AK

10261762	GMC	YUKON	2002	2009-02-23	TL*THE CONTACT OWNS A 2002 GMC YUKON. WHILE DRIVING APPROXIMATELY 55 MPH, THE CONTACT CRASHED INTO ANOTHER VEHICLE. HIS VEHICLE WAS COMPLETELY DESTROYED AND NONE OF THE AIR BAGS DEPLOYED. THE DRIVER SUSTAINED MODERATE BODILY INJURIES. IT HAS NOT YET BEEN DETERMINED WHY THE AIR BAGS FAILED TO DEPLOY. THE CONTACT HAS PICTURES OF THE FAILED INCIDENT AND A COPY OF THE POLICE REPORT. HE FILED A COMPLAINT WITH THE MANUFACTURER. THE FAILURE AND CURRENT MILEAGES WERE 107,000.
10544196	GMC	YUKON	2002	2013-09-12	TL* THE CONTACT OWNS A 2002 GMC YUKON. THE CONTACT STATED THAT WHILE DRIVING 45 MPH, HE CRASHED INTO THE PASSENGER'S SIDE OF ANOTHER VEHICLE AND THE AIR BAGS FIRED TO DEPLOY WITH THE IMPACT. IN ADDITION, THE SEAT BELT FAILED TO SECURE AS DESIGNED. THE CONTACT SUSTAINED A BRUISED RIB AND AN INJURY TO THE LEFT LEG. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS DESTROYED AND TOWED TO A SALVAGE FACILITY. THE MANUFACTURER WAS NOT NOTIFIED OF THE DEFECT. THE APPROXIMATELY FAILURE MILEAGE WAS 142,000.
10690133	GMC	YUKON	2002	2015-01-06	TL*THE CONTACT OWNS A 2002 GMC YUKON. THE CONTACT STATED THAT AFTER BEING INVOLVED IN A COLLISION, THE AIR BAGS FAILED TO DEPLOY. THE DETAILS OF THE COLLISION WERE NOT AVAILABLE. THE VEHICLE WAS DESTROYED. A POLICE REPORT WAS FILED. THE CONTACT SUSTAINED BACK INJURIES THAT DID NOT REQUIRE MEDICAL ATTENTION. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 225,000. THE VIN WAS UNAVAILABLE.
11298082	GMC	YUKON XL	2002	2019-02-05	I SWERVED TO MISS A DEER AND I HIT A TREE RUNNING 47 MPH AND MY AIR BAGS DIDN'T DEPLOY AND NO ONE CAN TELL ME WHY. MY HUSBAND AND I WERE VERY LUCKY BUT WHY DIDN'T THE AIR BAGS DEPLOY? MY HUSBAND WAS OUT OF WORK FOR 5 MONTHS DUE TO TORN LIGAMENTS IN HIS SHOULDERS AND STILL HAS TO HAVE SURGERY.
10048726	ISUZU	AMIGO	2002		THE TRUCK IMPACTED A TREE WHILE DRIVING 40 MPH AND AS A RESULT THE TRUCK'S FRONT BUMPER WRAPPED AROUND THE TREE. NEITHER THE DRIVER'S SIDE NOR PASSENGER'S SIDE AIR BAG DEPLOYED UPON IMPACT. THE DRIVER SUSTAINED SEVERE INJURIES, BUT NO BROKEN BONES. THE CAUSE OF THE AIR BAG FAILURE IS YET TO BE DETERMINED. PLEASE PROVIDE ANY ADDITIONAL INFORMATION. *NLM
764947	ISUZU	AXIOM	2002	2002-07-02	WE WERE INVOLVED IN AN ACCIDENT ON I270 IN ST. LOUIS, MO. A SEMI- TRUCK DOING APPROXIMATELY 35 MPH STRUCK US IN THE REAR AND FORCED US INTO THE PICK UP TRUCK IN FRONT OF US. THE AIR BAGS DID NOT DEPLOY, DESPITE THE SQUARE FRONT TO REAR IMPACT. THE FRONT PASSENGER SEAT IN MY VEHICLE BROKE, TWISTING THE PASSENGER TO THE SIDE, FACING THE STEERING WHEEL.*AK
10033920	ISUZU	AXIOM	2002	2003-08-13	CONSUMER STATED WHILE DRIVING AT 50 MPH CONSUMER'S VEHICLE REARENDED ANOTHER VEHICLE. UPON IMPACT, AIR BAGS FAILED TO DEPLOY. *AK
10050524	ISUZU	AXIOM	2002	2003-12-15	WHILE DRIVING AT 25 MPH LEFT FRONT TIRE BLEW OUT, DRIVER LOST CONTROL AND HIT A GUARD RAIL. UPON IMPACT, NONE OF THE AIR BAGS DEPLOYED. GOODYEAR, SIZE P235/65R17, DOT# UNKNOWN. CONSUMER STATED THERE WAS NOT AN ISSUE WITH THE TIRE, BUT HIS SON RAN OVER SOMETHING AND BLEW THE TIRE. *AK
10128420	ISUZU	AXIOM	2002	2005-07-11	DT: ON JULY 3RD THE CONSUMER RECEIVED A RECALL LETTER IN REFERENCE TO THE PASSENGER SIDE AIR BAG, RECALL # 03V113000. THE VEHICLE WAS TAKEN TO GALLES MOTOR CO. TO HAVE THE RECALL REPAIRED AT NO COST TO THE CONSUMER. ON JULY 11, 2005 THE CONSUMER'S WIFE HAD AN ACCIDENT IN WHICH SHE WAS INJURED. SHE REAR ENDED A CAR SITTING AT A RED LIGHT WHILE SHE WAS GOING 45 MPH. SHE WAS WEARING A SEAT BELT AT THE TIME BUT THE AIR BAGS DID NOT DEPLOY. THE WEATHER WAS DRY AND THE ROAD CONDITIONS WERE GOOD. THE VEHICLE HASN'T BEEN TAKEN TO THE DEALER YET FOR INSPECTION. THE DEALER WAS CONTACTED AND THEY SAID FOR HIM TO TAKE IT TO A MECHANIC. HE HASN'T BEEN ABLE TO GET A HOLD OF THE MFR. AT PRESENT, HIS CAR IS STILL AT THE WRECKING YARD. *NM
10148582	ISUZU	AXIOM	2002	2005-12-23	DT*: THE CONTACT STATED ON DECEMBER 23, 2005 WHILE DRIVING AT 60 MPH ON A DRY HIGHWAY THE CONTACT WAS RUN OFF THE ROAD BY A TRUCK. THE VEHICLE THEN COLLIDED WITH THE ROAD PARTITION, AND CRUSHED THE ENTIRE FRONT END OF THE VEHICLE. THE AIR BAGS DID NOT DEPLOY, AND THE DRIVER SUFFERED BRUISING FROM THE SAFETY BELT. THERE IS A RECALL, #02V213000 BUT THE CONTACT WAS NOT NOTIFIED OF THE RECALL WHEN THE VEHICLE WAS PURCHASED. UPDATED 02/28/06. *JB
8023834	ISUZU	RODEO	2002	2002-10-25	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH A POLE AT 35-40MPH AND NEITHER AIRBAG DEPLOYED. VEHICLE IS TOTALED DRIVER IN A COMA DEALER IS AWARE OF THE PROBLEM. TS
10049812	ISUZU	RODEO	2002	2003-11-28	WHILE MERGING ONTO THE INTERSTATE VEHICLE DROVE OVER SOME BLACK ICE, VEHICLE THEN SPUN AROUND, HIT A CONCRETE BARRIER, AND A GUARD RAIL. UPON IMPACT, FRONT AIR BAGS DID NOT DEPLOY. THE DRIVER AND PASSENGER SUSTAINED MINOR INJURIES. *AK
10184163	ISUZU	RODEO	2002	2006-11-19	CAR WAS INVOLVED IN AN ACCIDENT WHERE IT STRUCK THE BACK OF ANOTHER VEHICLE. THE COLLISION WAS ENOUGH TO CAUSE OVER \$4000.00 IN DAMAGE TO THE ISUZU BUT THE AIR BAGS FAILED TO DEPLOY. *JB

10443695	ISUZU	RODEO	2002	2011-05-18	TL* THE CONTACT OWNS A 2002 ISUZU RODEO. THE CONTACT WAS DRIVING APPROXIMATELY 35 MPH WHEN THE VEHICLE BEGAN TO ERRONEOUSLY DRIFT TO ONE SIDE. THE CONTACT LOST CONTROL OF THE VEHICLE AND THE VEHICLE MOVED INTO THE SHOULDER, CRASHING INTO THE BARRIER WALL ABRUPTLY. THE CONTACT WAS KNOCKED UNCONSCIOUS AND THE CONTACTS FOOT LANDED ON THE ACCELERATOR PEDAL AS HE LOST CONSCIOUSNESS. THE CONTACT WAS NOT AWARE AS THE VEHICLE CONTINUED TO ACCELERATE INTO ONCOMING TRAFFIC. THE VEHICLE THEN CRASHED INTO A TREE BEFORE FLIPPING. THE SEAT BELTS DETACHED FROM ITS HOUSING UNIT AND THE AIR BAGS NEVER DEPLOYED. THE CONTACT SUSTAINED SEVERE INJURIES TO THE HEAD, FACE, PELVIS AND SPINE. A PASSENGER WAS ALSO INJURED AND BOTH THE CONTACT AND THE PASSENGER WERE TRANSPORTED TO THE HOSPITAL. A POLICE REPORT WAS FILED OF THE INCIDENT AND THE VEHICLE WAS DESTROYED. THE FAILURE AND THE CURRENT MILEAGE WAS 150,000.
10553570	ISUZU	RODEO	2002	2013-11-24	WHILE TRAVELING ON A ROAD, A HORSE RAN ACROSS AND CAUSED A COLLISION. THE FRONT OF THE VEHICLE IS DAMAGED, AS WELL AS, BOTH SIDE WINDOWS AND THE RADIATOR. NONE OF THE AIRBAGS DEPLOYED CAUSING INJURIES TO TWO PEOPLE IN THE VEHICLE. THE OFFICER AT THE SCENE SAID THE AIRBAGS SHOULD HAVE DEFINITELY DEPLOYED. *TR
745117	CHEVROLET	ASTRO	2001	2001-04-19	VEHICLE WAS IN AN OFFSET FRONTAL CRASH, STRIKING THE REAR OF A FULL SIZE PICKUP TRUCK WITH THE LEFT HALF OF THE FRONT OF THE VAN. UPON IMPACT, FRONTAL AIR BAGS FAILED TO DEPLOY. *AK
8006423	CHEVROLET	ASTRO	2001	2002-03-06	WHILE DRIVING 35 MPH THE VEHICLE REAR ENDED A BUS YET THE AIRBAGS DID NOT DEPLOY, THE VEHICLE WAS A TOTAL LOSS. NLM *JG
886165	CHEVROLET	BLAZER	2001		WHILE TRAVELING 30-35 MPH AND AS A RESULT OF AN ACCIDENT AIR BAGS DID NOT DEPLOY. PLEASE PROVIDE FURTHER INFORMATION.*AK
894582	CHEVROLET	BLAZER	2001	2001-08-10	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION. SPEED WAS NOT DETERMINED, UPON IMPACT, BOTH AIR BAGS DID NOT DEPLOY, DEALER WAS NOTIFIED. *AK *YH
8015457	CHEVROLET	BLAZER	2001	2002-07-05	WHILE IN A FRONTAL IMPACT NONE OF THE AIR BAGS DEPLOYED. DEALER CONTACTED.*AK
8017355	CHEVROLET	BLAZER	2001	2002-07-07	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION INTO A DIRT WALL. UPON IMPACT, NEITHER AIR BAG DEPLOYED. FEEL FREE TO PROVIDE ANY FURTHER INFORMATION.*AK
8017786	CHEVROLET	BLAZER	2001	2002-08-16	WHILE DRIVING AT 35MPH AND WITH NO WARNING WHEN VEHICLE WAS HIT IN FRONT CENTER AIR BAGS DID NOT DEPLOY. DEALER NOTIFIED.*AK
8020006	CHEVROLET	BLAZER	2001	2002-09-14	CONSUMER STATES THAT WHEN HIT AT 40MPH IN THE FRONT CENTER OF THE VEHICLE THE AIR BAG DID NOT DEPLOY. DEALER NOTIFIED. NLM
8023471	CHEVROLET	BLAZER	2001	2002-07-01	WHILE TRAVELING ABOUT 55MPH ON THE HIGHWAY WITHOUT PRIOR WARNING SHE HIT AN ENBANKMENT. AND THE VEHICLE FLIP AND THE DRIVER SIDE AIRBAG DIDN'T DEPLOY. PLEASE FILL IN ADDITIONAL INFORMATION DEALER IS AWARE OF THE PROBLEM. PH
10002341	CHEVROLET	BLAZER	2001		CONSUMER STATES WHILE DRIVING 30MPH HAD FRONT END COLLISION AND NEITHER PASSENGER OR DRIVERS AIR BAG DEPLOYED. PLEASE PROVIDE ANY ADDITIONAL INFORMATION. TS
10060150	CHEVROLET	BLAZER	2001	2004-02-24	DRIVER SIDE AIR BAG FAILED TO DEPLOY IN A CRASH THROUGH: 1. A SIX FOOT TALL WOODEN FENCE AT ALMOST 30MPH, THEN 2. THE EXTERIOR SIDE OF A 2-STORY HOME THAT CONTAINED THE KITCHEN SINK AND PLUMBING FIXTURES, WHILE SMASHING UP AND OVER THE FIFTEEN-INCH CONCRETE FOUNDATION, FRONT-END FIRST.*AK
10072173	CHEVROLET	BLAZER	2001	2004-04-30	WHILE DRIVING AT 53 MPH, THE CONSUMER'S VEHICLE REAR ENDED ANOTHER VEHICLE. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THE CONSUMER SUSTAINED MINOR INJURIES. THE DEALERSHIP WAS NOTIFIED, BUT DID NOT RESOLVE THE PROBLEM. *AK *SC
10101364	CHEVROLET	BLAZER	2001	2004-11-11	CONSUMER'S VEHICLE WAS AT A COMPLETE STOP AND ANOTHER VEHICLE WAS COMING HEAD ON WHICH RESULTED IN A HEAD ON COLLISION. THERE WAS A VEHICLE BEHIND CONSUMER'S VEHICLE WHICH SHE WAS PUSHED INTO DUE TO THE HEAD ON COLLISION. HOWEVER, UPON IMPACT, AIR BAGS DID NOT DEPLOY. CONSUMER SUSTAINED MAJOR INJURIES. *AK
10105341	CHEVROLET	BLAZER	2001	2004-12-22	CONSUMER'S VEHICLE WAS INVOLVED IN A FRONT COLLISION AT 40 MPH DUE TO INCLEMENT WEATHER. UPON IMPACT, AIR BAGS DID NOT DEPLOY. CONSUMER CONTACTED THE MANUFACTURER. *AK
10106657	CHEVROLET	BLAZER	2001	2004-12-25	VEHICLE SLIPPED WHILE TRAVELING ON ICE AT 55 MPH, CAUSING THE VEHICLE TO STRIKE A CONCRETE RETAINING WALL, AND IT ROLLED OVER. UPON IMPACT, AIR BAGS DID NOT DEPLOY.*AK
10142568	CHEVROLET	BLAZER	2001	2005-10-05	DT: CONTACT STATED THE AIR BAGS DID NOT DEPLOY IN A HEAD ON CRASH. WHILE TRAVELING AT ABOUT 60 MPH THE VEHICLE HYDRO PLANED. THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED. THREE PEOPLE SUSTAINED INJURIES. A POLICE REPORT WAS TAKEN. THE DEALER WAS CONTACTED BUT OFFERED NO ASSISTANCE. THE MANUFACTURER INFORMED HER THEY HAVE A BUYER FOR THE VEHICLE, AND THEY OFFERED NO FREE REMEDY. VEHICLE WAS TOTALED.*AK
10174898	CHEVROLET	BLAZER	2001	2006-11-05	DT*: THE CONTACT STATED WHILE DRIVING 55 MPH, THERE WAS A MOMENTARY LOSS OF VEHICLE CONTROL, THE VEHICLE STRUCK A NEARBY TREE STUMP, AND THE AIRBAGS DID NOT DEPLOY. THE CONTACT WAS WEARING A SEAT BELT, BUT NO INJURIES WERE SUSTAINED. THERE WAS MODERATE DAMAGE TO THE FRONT OF THE VEHICLE. THE POLICE WERE ALERTED, AND A REPORT WAS TAKEN. THE MANUFACTURER WAS ALERTED.

10175892	CHEVROLET	BLAZER	2001	2001-12-04	MY DAUGHTER WAS IN A CAR CRASH. UNFORTUNATELY MY DAUGHTER WAS AT FAULT. SHE WAS GOING 55 MPH AND HIT A CAR THAT WAS STOPPED AT A LIGHT HER AIR BAG DID NOT DEPLOY. SHE HAS NECK AND BACK PAINS. *JB
10184395	CHEVROLET	BLAZER	2001	2005-05-19	A FRONTAL IMPACT OCCURRED AT 40 MPH AS ANOTHER MOTORIST PULLED OUT IN FRONT OF ME. THE AIR BAGS DID NOT DEPLOY. THE FRONT DRIVER SEAT BELT DID NOT PROPERLY RESTRAIN ME AND I WAS FORCED INTO THE ROOF AT THE TRIM EDGE OF THE WINDSHIELD, SUSTAINING A MINOR SCALP LACERATION, CERVICAL DISC DAMAGE, AND A CONCUSSION. THE VEHICLE WAS TOTALED BY NATIONWIDE INSURANCE. *JB
10454988	CHEVROLET	BLAZER	2001	2012-04-06	TL* THE CONTACT OWNS A 2001 CHEVROLET BLAZER. THE CONTACT STATED THAT WHILE DRIVING 40 MPH, THE CONTACT CRASHED INTO THE SIDE OF ANOTHER VEHICLE. THE CONTACT STATED THAT THE FORCE OF THE IMPACT CAUSED THE VEHICLE TO BOUNCE OFF THE SECOND VEHICLE. THE AIR BAGS DID NOT DEPLOY. THE PASSENGER SUSTAINED INJURIES TO THE LEFT ANKLE AND KNEES, AS WELL AS A BROKEN THUMB. THE CONTACT WAS TRANSPORTED TO THE HOSPITAL AS A PRECAUTIONARY MEASURE. THE VEHICLE WAS NOT INSPECTED FOR THE CAUSE OF FAILURE NOR REPAIRED. THE FAILURE AND THE CURRENT MILEAGES WERE 122,000.
752662	CHEVROLET	SILVERADO	2001	2001-09-22	CRASHED INTO 14FOOT UHAUL GOING ABOUT 65MPH AIR BAGS NEVER WORKED. PLEASE ADVISE! *AK
754465	CHEVROLET	SILVERADO	2001	2001-08-04	A TWO IMPACT WRECK, WITH THE SECOND AT 55 MPH HIT HEAD ON, NO AIRBAG OR ONSTAR DEPLOYMENT. *AK
757639	CHEVROLET	SILVERADO	2001	2002-01-16	DRIVER'S SIDE AIRBAG DID NOT DEPLOY DURING A FRONTAL IMPACT CRASH AT APPROXIMATELY 40 MPH.*AK
765623	CHEVROLET	SILVERADO	2001	2002-07-24	NO AIRBAGS DEPLOYED DURING FRONTAL COLLISION AT 40 MPH CRASH. OCCUPANT OF OTHER VEHICLE HAD TO BE EXTRACATED FROM HER VEHICLE AND LIFE FLIGHTED TO MEDICAL FACILITY.*AK
894462	CHEVROLET	SILVERADO	2001	2001-08-04	CONSUMER'S VEHICLE REAR ENDED A BIG WEIGHT TRUCK AT APPORXIMATELY 65 MPH, AND NEITHER DRIVER'S SIDE NOR PASSENGER'S SIDE AIRBAGS DEPLOYED. DEALER HAS BEEN EXAMINING THE VEHICLE.*AK
896975	CHEVROLET	SILVERADO	2001	2001-09-22	WHILE TRAVELING APPROXIMATELY 55 MPH, VEHICLE REAR ENDED A U-HAUL TRUCK THAT WAS ALSO IN MOTION. APPROXIMATELY \$4600.00 DAMAGE WAS DONE TO THE FRONT END OF VEHICLE, AND AIR BAGS FAILED TO DEPLOY. DEALERSHIP STATED THAT AIR BAGS FAILED TO DEPLOY BECAUSE BOTH VEHICLES WERE IN MOTION. PLEASE PROVIDE ANY ADDITIONAL INFORMATION / ATTACHMENTS. *NOTE: DRIVER OF VEHICLE SUFFERED ARM, WRIST, AND LEG INJURIES.*AK
899261	CHEVROLET	SILVERADO	2001	2001-10-11	WHILE OPERATING VEHICLE IN WET ROAD CONDITIONS, AND TRAVELING APPROXIMATELY 50 TO 55 MPH VEHICLE HYDROPLANED AND CRASHED INTO A CEMENT BARRIER. BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. NO EXAMINATION OF THE VEHICLE HAS TAKEN PLACE TO DETERMINE A CAUSE FOR THIS PROBLEM. *NOTE: DRIVER RECEIVED SEVERE FACIAL INJURIES. PLEASE PROVIDE ANY ADDITIONAL INFORMATION / DOCUMENTATION. *AK
8001948	CHEVROLET	SILVERADO	2001	2002-01-07	VEHICLE WAS INVOLVED IN 20-25 MPH FRONTAL COLLISION IN WHICH DRIVERS AND PASSENGERS AIR BAGS DID NOT DEPLOY, CAUSE UNKNOWN, DEALER HAS BEEN NOTIFIED. *AK*SLC
8002768	CHEVROLET	SILVERADO	2001	2002-01-16	FRONTAL IMPACT AT 65MPH TOTALED VEHICLE; UPON IMPACT, AIR BAGS DIDN'T DEPLOY. DELAER WAS NOTIFIED.*AK
8004056	CHEVROLET	SILVERADO	2001	2002-02-05	CONSUMER HAD A HEAD-ON COLLISION AT 55 MPH AND NEITHER AIRBAG DEPLOYED. DRIVER AND PASSENGER SUFFERED CHEST/NECK AND LEG INJURIES. VEHICLE WAS TOTALED.*AK CONSUMER STATES THAT A PERSON FROM THE OTHER VEHICLE WAS KILLED IN THE ACCIDENT. *SLC
8004268	CHEVROLET	SILVERADO	2001	2002-02-17	WHILE DRIVING AT 55 MPH CONSUMER'S VEHICLE RAN INTO ANOTHER VEHICLE HEAD-ON, BUT NONE OF AIR BAGS DEPLOYED. HAS NOT CONTACTED DEALER.*AK
8005327	CHEVROLET	SILVERADO	2001	2002-02-27	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION OF APPROXIMATELY 50 MPH, AND NEITHER FRONTAL AIR BAG DEPLOYED. DEALER / MANUFACURER WERE NOTIFIED. FEEL FREE TO PROVIDE ANY FURTHER INFORMATION.*AK
8006559	CHEVROLET	SILVERADO	2001	2002-03-23	CONSUMER STATES WHILE DRIVING 30-35 MPH WITHOUT WARNING OCCURRED IN A FRONTAL COLLISION THE AIR BAGS NOT DEPLOY CAUSING MINOR INJURIES. NLM
8009248	CHEVROLET	SILVERADO	2001	2002-03-06	WHILE TRAVELING ON HIGWAY HIT ANOTHER VEHICLE/ VEHICLE IN ANOTHER LANDE TO OVOID CAR HE HIT AND RAN INTO MERIDIAN STRIP. UPON IMPACT, DUAL AIRBAGS DIDN'T DEPLOY. DEALERSHIP WASAWARE OF PROBLEM.*AK
8012069	CHEVROLET	SILVERADO	2001	2002-06-08	WHILE DRIVING TRUCK AT 40 MPH VEHICLE INVOLVED IN A FRONTAL COLLISION WITH ANOTHER SPEEDING VEHICLE. UPON IMPACT, AIR BAGS FAILED TO DEPLOY. TRUCK WAS TAKEN TO DEALERSHIP ,AND THEY INFORMED OWNER THAT "THERE WAS NO REASON FOR AIR BAGS NOT TO DEPLOY". PLEASE DESCRIBE DETAILS. *AK
8012818	CHEVROLET	SILVERADO	2001	2002-06-08	IN A FRONTAL COLLISON WHILE DRIVING AT 60MPH NONE OF THE AIR BAGS DEPLOYED. VEHICLE HAD MAJOR DAMAGE. *AK
8017140	CHEVROLET	SILVERADO	2001	2002-08-18	IN A FRONTAL COLLISION NONE OF THE AIR BAGS DEPLOYED ON IMPACT, CAUSING INJURIES TO DRIVER.*AK. ALSO THE PASSENGER WAS INJURED.*JB
10001355	CHEVROLET	SILVERADO	2001		CONSUMER STATES: WHILE DRIVING AT THE SPEED OF 45MPH WAS INVOLVED IN A FRONTAL COLLISION NEITHER AIR BAG DEPLOYED. DEALER HAS BEEN NOTIFIED. PLEASE PROVIDED ANY ADDITIONAL IN FORMATION. TS

10001771	CHEVROLET	SILVERADO	2001		WHILE TRAVELING AT 65 MPH, CONSUMER STATES' ANOTHER DRIVER PULLED INFRONT AND CONSUMER HIT THAT VEHICLE ON ITS SIDE. NONE OF THE VEHICLES AIR BAGS DEPLOYED. CONSUMER FEELS THAT THIS COLLISION WAS A HARD IMPACT AND AIRBAGS SHOULD HAVE DEPLOYED.
10006756	CHEVROLET	SILVERADO	2001	2003-01-30	CONSUMER WAS IN A ACCIDENT AND HIT A WALL AND THE AIR BAGS DIDN'T DEPLOY UPON CONTACT. PH
10020745	CHEVROLET	SILVERADO	2001	2003-05-23	FRONTAL IMPACT ON FREEWAY AT 45 MPH CHEVROLET, SILVERADO 4X4 TOTALED. AIRBAGS DID NOT DEPLOY UPON IMPACT. *AK
10024534	CHEVROLET	SILVERADO	2001	2002-03-12	PROBLEM WITH AIRBAG SYSTEM ON 2001 CHEVROLET PICK UP TRUCK. *MR THE VEHICLE COLLIDED WITH A MOVING ANIMAL AND THE AIRBAG(S) DIDN'T DEPLOY. (THE ANIMAL WAS ABOUT SIX HUNDRED POUNDS AND THE CONSUMER HAD DRIVEN THE VEHICLE AT A NORMAL SPEED) *SCC *JB
10041290	CHEVROLET	SILVERADO	2001	2003-10-17	A 2001 CHEVY SILVERADO WAS STRUCK ON THE SIDE AND SENT INTO A TREE AT BETWEEN 30-35 MPH. THERE WAS SIGNIFICANT FRONT END DAMAGE AND THE AIR BAGS DID NOT DEPLOY. *LA
10042759	CHEVROLET	SILVERADO	2001	2000-12-31	WHILE DRIVING AT 55 MPH CONSUMER LOST CONTROL OF VEHICLE WHILE TRAVELING UP A HILL. THEN VEHICLE STRUCK A WOODEN FENCE. ONE BEAM OF THE FENCE CAME THROUGH THE WINDSHIELD, STRIKING THE CONSUMER IN THE HEAD, EVENTUALLY KILLING HIM. ALSO, TWO PASSENGERS SUSTAINED INJURIES. IN THE CONFUSION, CONSUMER DEPRESSED THE GAS PEDAL INSTEAD OF THE BRAKES AND STRUCK A FIRE HYDRANT. ALL PASSENGERS AND THE CONSUMER WERE WEARING SEAT BELTS. HOWEVER, THE AIR BAGS DID NOT DEPLOY. POLICE ARRIVED ON THE SCENE AND MADE A REPORT. MANUFACTURER AND DEALER HAD BEEN NOTIFIED OF THE INCIDENT. *AK
10059656	CHEVROLET	SILVERADO	2001	2001-12-19	LAWYER REPRESENTING CONSUMER WHO WAS INJURED WHEN THE DRIVER'S SIDE AIRBAG FAILED TO DEPLOY. *LA (LAWYER CLYDE JACKSON ON BEHALF OF CLIENT)* JB
10072926	CHEVROLET	SILVERADO	2001	2001-12-19	I WAS DRIVING EAST ON F.M. 356 AT ABOUT NOON. I WAS TRAVELLING ABOUT 50 MPH. A CAR TURNED IN FRONT OF ME AND I ATTEMPTED TO PASS THE CAR. I WAS UNABLE TO DUE TO ONCOMING TRAFFIC, SO I QUICKLY RETURNED TO MY LANE. ONE OF MY TIRES WENT OFF ONTO THE UNPAVED SHOULDER AND I WENT DOWN A SMALL EMBANKMENT. IT WAS MUDDY SO I COULD NOT STOP. I HIT A LARGE PINE TREE HEAD ON AND STOPPED. BOTH OF US WERE WEARING OUR SEATBELTS. MY AIRBAG FAILED TO DEPLOY CAUSING MY HEAD AND TORSO TO STRIKE THE STEERING WHEEL. I SUFFERED 6TH NERVE PAIN AND AN ANEURYSM DEVELOPED ON MY AORTA. THE AORTA HAD TO BE SURGICALLY REPAIRED. MY GRANDDAUGHTER'S AIRBAG HAD BEEN TURNED OFF DUE TO HER SMALL SIZE. SHE SUFFERED A BROKEN LEG AND A SLIGHT CONCUSSION. THE TRUCK WAS TOTALED. *AK
10079979	CHEVROLET	SILVERADO	2001	2004-06-25	WHILE DRIVING CONSUMER WAS TOWING A TRAILER THE DRIVER'S SIDE REAR TIRE TREADS SEPARATED FROM THE TRAILER. CONSUMER WAS NOT ABLE TO MAINTAIN CONTROL OF THE VEHICLE, AND COLLIDED INTO A CONCRETE BARRIER. UPON IMPACT, BOTH FRONTAL AIR BAGS DID NOT DEPLOY. PASSENGER SUSTAINED HEAD INJURIES, AND WAS TRANSPORTED TO A HOSPITAL BY AN AMBULANCE. VEHICLE AND TRAILER WERE TOTALED. *AK *NM
10103512	CHEVROLET	SILVERADO	2001	2004-12-05	CONSUMER'S, VEHICLE WAS REAR ENDED WHILE DRIVING 50 MPH. THE VEHICLE WAS FORCED INTO A SPIN AND THEN, IT HIT A CONCRETE ROAD DIVIDER. UPON IMPACT, NEITHER FRONTAL AIR BAGS DEPLOYED. DRIVER SUSTAINED INJURIES, AND HAD TO BE TRANSPORTED TO A LOCAL HOSPITAL. DEALER AND MANUFACTURER WERE NOTIFIED. *AK THE CONSUMER STATED THAT THE SEAT BELT DID NOT KEEP HER FROM HITTING HER CHEST ON THE STEERING WHEEL. AFTER THE FRONT AND THE BACK OF THE VEHICLE HIT THE CONCRETE DIVIDER THE AIR BAGS DID NOT DEPLOY. *TC
10107706	CHEVROLET	SILVERADO	2001	2004-12-29	AIR BAGS FAILED TO DEPLOY IN A 45 MPH FRONT END COLLISION ON MY 2001 CHEVROLET SILVERADO. *NM
10109017	CHEVROLET	SILVERADO	2001	2005-01-04	WHILE TRAVELING AT 55 MPH CONSUMER LEFT THE FREEWAY AND STRUCK A LARGE PILE OF DIRT. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. CONSUMER SUSTAINED HEAD AND BACK INJURIES. WAS TAKEN TO THE EMERGENCY ROOM. THE VEHICLE WAS TOTALED. *AK *AK
10138394	CHEVROLET	SILVERADO	2001	2005-06-01	THERE WAS AN ACCIDENT ON JUNE 1, 2005. UPON IMPACT, THE DRIVER'S SIDE FRONTAL AIRBAG FAILED TO DEPLOY. THE PASSENGER SIDE AIRBAG HAD BEEN TURNED OFF. THE DRIVER SUSTAINED MINOR INJURIES. THE CONSUMER REAR ENDED A TRAILER.. A POLICE REPORT WAS TAKEN. NO AIRBAG WARNING LIGHT CAME ON. *AK UPDATED 11/02/05. *JB

					MY FIANCE AND I WERE DRIVING HOME AND AS WE ENTERED TOWN GOING APPROXIMATELY 35-45 MPH THE VEHICLE SWERVED OFF THE ROAD AND COLLIDED INTO A TELEPHONE POLE BREAKING IT IN HALF CAUSING THE TOP HALF OF THE TELEPHONE POLE TO SWING DOWN AND SMACK INTO THE WINDSHIELD. HE SMACKED HIS FACE OFF OF THE STEERING WHEEL AND I WAS LAYING DOWN ON THE SEAT AND ROLLED OFF AND BROKE THE ASHTRAY HOLDER WITH MY FACE. DURING THE IMPACT NOT A SINGLE AIRBAG DEPLOYED EVEN THOUGH THE AIRBAGS WERE ALL IN WORKING ORDER. THE IMPACT WAS SO SEVERE THAT THE TAILGATE OF THE TRUCK BENT OUTWARD, THE RADIATOR WAS RIPPED OUT FROM BENEATH THE VEHICLE AND THE FRONT PASSENGER SIDE WAS TOTALED. I WAS THEN PUT INTO A NECK BRACE, STRAPPED TO A GURNEY AND RUSHED TO THE HOSPITAL. I WILL REITERATE THE FACT THAT NONE OF THE AIRBAGS DEPLOYED CAUSING THE BOTH OF US TO BE INJURED. WE LUCKILY SURVIVED THE CRASH BUT HAD THE AIRBAGS DEPLOYED THE BOTH OF US WOULD HAVE SUFFERED MINIMAL INJURIES. *TR
10553271	CHEVROLET	SILVERADO	2001	2013-11-14	
10627738	CHEVROLET	SILVERADO	2001	2014-01-01	I REAR ENDED SOMEONE GOING ABOUT 70 MPH AND MY AIR BAGS DID NOT DEPLOY. *TR
560449	CHEVROLET	SUBURBAN	2001		NO DEPLOYMENT OF THE AIR BAG DURING ACCIDENT CAUSING THE CONSUMER TO JAM HIS HAND ON THE STEERING WHEEL AND TO INJURE HIS BACK. NLM
747375	CHEVROLET	SUBURBAN	2001	2001-05-24	FRONT AIRBAGS FAILED TO DEPLOY DURING A HEAD ON COLLISION AT 30 MPH. FINAL DAMAGE ESTIMATE UNKNOWN DUE TO PENDING SAFETY INVESTIGATION. *AK
879983	CHEVROLET	SUBURBAN	2001	2000-12-27	COSNUMER WAS DRIVING AT APPROXIMATELY 35-40 MPH, WENT OFF ROAD TO AVOID ONCOMING VEHICLE, RAN INTO DITCH HEAD ON, AND HIT A TREE. VEHICLE WAS TOTALED. UPON IMPACT, DUAL AIRBAGS DID NOT DEPLOY, CAUSING MINOR INJURIES.*AK
8004064	CHEVROLET	SUBURBAN	2001	2002-02-05	CONSUMER HAD A FRONT COLLISION AT 35-40 MPH, AND NEITHER AIRBAG DEPLOYED. CONSUMER SUFFERED NECK/ BACK AND KNEE INJURIES. VEHICLE AT DEALERSHIP AT THIS TIME. PLEASE ADD FURTHER DETAILS.*AK
8007135	CHEVROLET	SUBURBAN	2001	2001-11-26	WHILE DRIVING AT 45 MPH CONSUMER T BONED ANOTHER VEHICLE, AND THEN SPUN OUT OF CONTROL, AND RAN INTO A DITCH. UPON IMPACT, NONE OF THE AIR BAGS DEPLOYED. CONTACTED DEALER, AND THE DEALER WAS NOT WILLING TO DO ANYTHING. *AK *YH
8014347	CHEVROLET	SUBURBAN	2001	2002-07-10	AT 45MPH VEHICLE CRASHED. UPON IMPACT, AIRBAGS DID NOT DEPLOY. CAUSE UNKNOWN. DEALER NOTIFIED.*AK
10017673	CHEVROLET	SUBURBAN	2001		THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION, AND THE NONE OF THE AIR BAGS DEPLOYED. *JB
10042734	CHEVROLET	SUBURBAN	2001	2003-09-27	WHILE DRIVING 60 MPH VEHICLE WAS INVOLVED IN A HEAD ON COLLISION AND AIR BAGS DID NOT DEPLOY. *AK
10046437	CHEVROLET	SUBURBAN	2001	2003-10-08	WHILE DRIVING, ANOTHER MOTORIST FAILED TO STOP AT A RED LIGHT AND THE CONSUMER HIT HIM ON THE PASSENGER'S SIDE AND THE AIR BAGS DID NOT DEPLOY. *AK *SC *JB
10248294	CHEVROLET	SUBURBAN	2001	2008-11-06	TL*THE CONTACT OWNS A 2001 CHEVROLET SUBURBAN. ON NOVEMBER 6, 2008, THE CONTACT WAS INVOLVED IN A SERIOUS CRASH. THE AIR BAGS FAILED TO DEPLOY AND THE ENTIRE FRONT END AND PASSENGER SIDE OF THE VEHICLE WERE DAMAGED. THE VEHICLE WAS DESTROYED. THE CONTACT HAS PICTURES AND A POLICE REPORT. THERE WERE NO OTHER PASSENGERS IN THE VEHICLE AND THE CONTACT WAS WEARING HER SEAT BELT AT THE TIME. THERE WAS NO MAINTENANCE PERFORMED ON THE AIR BAGS PRIOR TO THE CRASH. THE SPEED WAS UNKNOWN. THE FAILURE MILEAGE WAS 100,000.
10335493	CHEVROLET	SUBURBAN	2001	2010-05-18	TL*THE CONTACT OWNS A 2001 CHEVROLET SUBURBAN. THE CONTACT STATED THAT ON MAY 18, 2010, WHILE DRIVING AT 45 MPH, THE VEHICLE COLLIDED WITH AN ONCOMING VEHICLE. THE AIR BAGS DID NOT DEPLOY. THE VEHICLE SUSTAINED EXTENSIVE DAMAGES AND WAS TOWED FROM THE SCENE. THE CONTACT AND PASSENGERS SUSTAINED INJURIES AND WERE TAKEN TO THE HOSPITAL. A POLICE REPORT WAS FILED. THE CONTACT HAD NOT CALLED THE DEALERSHIP OR THE MANUFACTURER AT THE TIME OF THE COMPLAINT. THE FAILURE AND CURRENT MILEAGES WERE APPROXIMATELY 105,000.
10731769	CHEVROLET	SUBURBAN	2001	2015-06-15	MY SON WAS DRIVING AND REAR ENDED A MAN GOING APPROXIMATELY 50 MPH. THE FRONT END SUSTAINED A GREAT DEAL OF DAMAGE, INCLUDING, BUT NOT LIMITED TO, THE ENGINE BEING PUSHED BACK SEVERAL INCHES. THE AIR BAGS DID NOT DEPLOY. MY SON SUSTAINED MINOR WHIPLASH TYPE INJURIES TO HIS NECK AND BACK.
10731772	CHEVROLET	SUBURBAN	2001	2015-06-18	TL* THE CONTACT OWNED A 2001 CHEVROLET SUBURBAN. WHILE DRIVING AT 55 MPH UPHILL, THE CONTACT DEPRESSED THE BRAKE PEDAL AND THE VEHICLE HYDROPLANED. AS A RESULT, THE CONTACT CRASHED INTO THE REAR OF A PICK-UP TRUCK. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED. THERE WAS ONE INJURY THAT REQUIRED MEDICAL ATTENTION. THE VEHICLE WAS DESTROYED AND TOWED TO AN INDEPENDENT MECHANIC. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 270,000.
764291	CHEVROLET	TAHOE	2001	2002-07-10	TAHOE WAS TRAVELING UPHILL ON PRIVATE GRAVEL DRIVE WHEN HIT BY TRUCK TRAVELING DOWNHILL AROUND BLIND CURVE. TRUCK WAS TRAVELING AT BETWEEN 20 AND 25 MPH WHEN IT HIT TAHOE. BOTH OF TRUCK'S AIRBAGS INFLATED. MY AIRBAGS DID NOT INFLATE, AND I HIT THE STEERING WHEEL WITH MY STOMACH AND CHEST.*AK

766175	CHEVROLET	TAHOE	2001	2002-07-19	HIT BY A RED LIGHT RUNNER (45/50MPH) ON DRIVER'S SIDE, HIT A SECOND CAR, THEN A CONCRETE POST HEAD ON. NOT ONE OF THE FOUR AIR BAGS ENGAGED AT ANYTIME. THE CAR WAS TOTALED. I HAVE DOCUMENTATION, PICTURES, POLICE REPORT, AND HAVE CONTACTED CHEVY, THEY HAVE NO CLEAR RESPONSE ON WHY? IF YOU WOULD LIKE MORE DETAIL ON INJURES OR HAVE ANY QUESTION PLEASE FILL FREE TO CONTACT ME. THANK YOU FOR YOUR TIME, DANIELLE HURST-STONE. *AK
884576	CHEVROLET	TAHOE	2001	2001-03-21	VEHICLE WAS INVOLVED IN AN ACCIDENT WHILE TRAVELING AT 50 MPH WHEN VEHICLE T-BONED A VEHICLE CROSSING AN INTERSECTION. AIRBAGS FAILED TO DEPLOY. DEALERSHIP COULD NOT PROVIDE A REASON FOR FAILURE OF AIRBAGS TO DEPLOY. *AK THE MAUFACTURER INDICATED THAT THE VEHICLE SKIDDED 20 TO 25 FEET AFTER IMPACT AND THE AIR BAG FAILED TO DEPLOY FOR THIS REASON. THE CONSUMER DISAGREES. *YH
899507	CHEVROLET	TAHOE	2001	2001-11-01	DRIVER'S SIDE AND PASSENGER'S SIDE AIRBAGS FAILED TO DEPLOY IN A FRONT END COLLISION. DEALER HAS YET TO BE CONTACTED. PLEASE PROVIDE FURTHER DETAILS.*AK
8000772	CHEVROLET	TAHOE	2001	2001-12-01	DRIVER AND PASSENGER FRONTAL AIRBAGS FAILED TO DEPLOY WHEN CONSUMER WAS INVOLVED IN A 40MPH FRONTAL COLLISION. DEALER HAS YET TO BE CONTACTED. PLEASE PROVIDE FURTHER DETAILS.*AK
8017829	CHEVROLET	TAHOE	2001	2001-09-19	WHILE TRAVELING ONTO ON INTERSECTION ANOTHER VEHICLE RAN THE RED LIGHT AND HIT CONSUMER'S VEHICLE. UPON IMPACT, DUAL AIRBAGS DIDN'T DEPLOY.DEALERSHIP WAS AWARE OF PROBLEM.*AK *YH
8018113	CHEVROLET	TAHOE	2001	2002-04-05	WHILE TRAVELING AT 35 MPH CONSUMER WAS HIT HEAD-ON, AND VEHICLE ALMOST TIPPED OVER. UPON IMPACT, FRONT AIR BAGS FAILED TO DEPLOY. PLEASE PROVIDE ANY FURTHER INFORMATION.*AK
10018205	CHEVROLET	TAHOE	2001	2003-05-05	THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION, AND NONE OF THE AIR BAGS DEPLOYED. *NLM *PH *JB
10044753	CHEVROLET	TAHOE	2001	2003-10-12	WHILE DRIVING 50 MPH, THE CONSUMER'S VEHICLE WAS INVOLVED IN A HEAD ON COLLISION. UPON IMPACT, THE AIRBAGS DID NOT DEPLOY. THE DRIVER SUSTAINED SEVERE HEAD INJURIES AND WAS TAKEN TO A HOSPITAL. *AK *JB *NM
10046166	CHEVROLET	TAHOE	2001	2003-08-03	WHILE DRIVING 40 MPH DRIVER HIT THE BRAKES SUDDENLY AND VEHICLE HIT THE CURB AND ROLLED TWICE. UPON IMPACT, AIRBAGS DID NOT DEPLOY. PEOPLE WERE EJECTED FROM THE VEHICLE. AS A RESULT,THEY DIED. *AK
10066520	CHEVROLET	TAHOE	2001	2004-04-12	FRONTAL AIRBAGS DID NOT DEPLOY IN COLLISION. *AK
10072577	CHEVROLET	TAHOE	2001	2004-04-30	I WAS DRIVING ON THE FREEWAY. THE CRUISE CONTROL WAS SET AT 70 MPH. IT WAS RAINING I WENT THROUGH A PUDDLE AND THE CAR HYDROPLANED AND HEADED TOWRD THE CONCRETE MEDIAN, IT WOULD NOT STRAIGHTEN AND I HIT THE MEDIAN HEAD ON. THE AIRBAGS DID NOT DEPLOY.*AK
10148912	CHEVROLET	TAHOE	2001	2004-12-06	HEAD-ON COLLISION AT 50 MPH AND AIRBAGS DID NOT INFLATE.*AK
10197689	CHEVROLET	TAHOE	2001	2003-11-03	DRIVING IN LARGE PARKING LOT APPROX 25 MPH, LIGHT POLE WITH CONCRETE BASE WAS IN BLIND SPOT AS I WAS TURNING. HIT THE CONCRETE HEAD ON, \$12,000 WORTH OF DAMAGE TO MY TRUCK, FRAME BENT, FRONT END REPLACED AND THE AIR BAGS FAILED TO DEPLOY. THE DEALER HAD NO EXPLANATION OTHER THAN THE DAMAGE MUST HAVE BEEN IN JUST THE WRONG SPOT. I WENT TO THE HOSPITAL WITH HEAD AND NECK INJURIES. *JB
10223626	CHEVROLET	TAHOE	2001	2008-03-28	AIRBAGS FAILED TO DEPLOY IN HEAD-ON CRASH. *TR
10365882	CHEVROLET	TAHOE	2001	2010-11-12	I WAS INVOLVED IN A COLLISION IN MY 2001 CHEVROLET TAHOE WHERE I REAR ENDED A CAR. MY VEHICLE WAS TRAVELING 54 MPH AND THE OTHER VEHICLE WAS SLOWING TO TURN WITHOUT BLINKERS OR BRAKE LIGHTS. MY AIRBAGS DID NOT DEPLOY. *TR
10607227	CHEVROLET	TAHOE	2001	2007-07-04	A VEHICLE PULLED IN FRONT OF US AND OUR VEHICLE T BONED THAT VEHICLE. NONE OF ARE AIR BAGS DEPLOYED. WE WERE INJURED. THAT PERSON'S INSURANCE COMPANY CONTACTED US THE DAY AFTER THE ACCIDENT AND QUESTIONED WHY THE AIR BAGS DID NOT COME OUT? WE WANTED TO KNOW WHY ALSO. *TR
10783656	CHEVROLET	TAHOE	2001	2015-10-16	THE VEHICLE AIRBAGS FAILED TO DEPLOY IN ACCIDENT WERE IT RECEIVED SEVERE FRONT END DAMAGE.
10820375	CHEVROLET	TAHOE	2001	2014-01-18	TL* THE CONTACT OWNS A 2001 CHEVROLET TAHOE. WHILE DRIVING AT 45 MPH, ANOTHER VEHICLE FAILED TO YIELD AND THE CONTACT CRASHED INTO THE DRIVER SIDE OF THAT VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT DID NOT SUSTAIN ANY INJURIES. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO AN AUTO BODY REPAIR CENTER FOR BODY REPAIRS, BUT WAS NOT DIAGNOSED FOR THE AIR BAG FAILURE. THREE YEARS LATER, WHILE DRIVING 25 MPH, THE CONTACT CRASHED INTO AN ANIMAL AND THEN INTO A GUARDRAIL. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT SUSTAINED BACK INJURIES THAT REQUIRED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO AN AUTO BODY REPAIR CENTER, BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 120,000. THE VIN WAS UNAVAILABLE.
891862	CHEVROLET	TRACKER	2001	2001-07-02	WHILE TRAVELING AT 45 TO 50 MPH ANOTHER VEHICLE IN FRONT SLAMMED ON VEHICLE'S BRAKES, AND CONSUMER'S VEHICLE REAR ENDED THE OTHER VEHICLE. NONE OF AIRBAGS DEPLOYED, AND DRIVERS SIDE SEATBELT FAILED TO LOCK. CONSUMER WAS INJURED BY STEERING WHEEL. CONSUMER HAD VEHICLE TOWED TO DEALER. PLEASE PROVIDE ANY FURTHER INFORMATION.*AK
8011220	CHEVROLET	TRACKER	2001	2002-05-28	IN AN ACCIDENT, VEHICLE HIT A POLE AND UPON IMPACT AIRBAGS DID NOT DEPLOY, CAUSING MINOR INJURIES TO DRIVER.*AK *YH

10033620	CHEVROLET	TRACKER	2001	2003-08-11	CONSUMER STATED WHILE DRIVING AT NORMAL SPEED AND WEARING SEAT BELT HAD A FRONT COLLISION ,AND NEITHER OF THE AIR BAGS DEPLOYED. NO WARNING LIGHT APPEARED PRIOR TO THE CRASH. POLICE REPORT AND PICTURES ARE AVAILABLE. *AK
10033912	CHEVROLET	TRACKER	2001		WHILE DRIVING 50 MPH DRIVER STRUCK A DEER HEAD ON. UPON IMPACT, DRIVER SIDE AIRBAG DIDN'T DEPLOY. THE DRIVER SUSTAINED SLIGHT INJURIES FROM MAKING CONTACT WITH THE STEERING WHEEL. *AK
10226797	CHEVROLET	TRACKER	2001	2008-04-17	TL*THE CONTACT OWNS A 2001 CHEVROLET TRACKER. WHILE DRIVING 40 MPH ON A MAJOR HIGHWAY, THE CONTACT CRASHED INTO ANOTHER VEHICLE THAT WAS STOPPED IN THE ROAD. THE AIR BAGS FAILED TO DEPLOY. THE VEHICLE WAS DESTROYED. THE CONTACT WAS INJURED AND TRANSPORTED TO THE HOSPITAL. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE 130,000.
10263033	CHEVROLET	TRACKER	2001	2009-02-01	DRIVER OF VEHICLE WHILE TRAVELING 35 MPH HIT A FORD F150 THAT MADE A U-TURN FROM THE RIGHT SHOULDER OF THE ROAD. DRIVER DID NOT HAVE TIME TO HIT BRAKES. AIRBAG DID NOT DEPLOY. DRIVER WAS INJURED. *TR
10298267	CHEVROLET	TRACKER	2001	2010-01-03	AIRBAG DID NOT DEPLOY ON CHEVY TRACKER 2001 AFTER BEING REAR ENDED AT 100 MPH WHILE TRAVELING AT A SPEED OF 69 MPH AND HIT THE CENTER DIVIDER HEAD ON. *TR
8014453	CHEVROLET	TRAILBLAZER	2001		AT A 25MPH VEHICLE CRASHED AND AIRBAGS DID NOT DEPLOY. CAUSE UNKNOWN DEALER NOTIFIED.*AK
8018335	CHEVROLET	TRAILBLAZER	2001		WHILE DRIVING APPROXIMATELY 58 MPH IN RAINY WEATHER WITH A TRAILER ATTACHED, TRAILER STARTED TO FISHTAIL WHILE GOING DOWN HILL. TRAILER HAD SWUNG AROUND AND BROKE FREE OF THE HITCH AND HIT THE SIDE OF TRUCK. TRUCK GRAZED AN ENBANKMENT, AND WENT INTO THE MEDIUM STRIP, HITTING ANOTHER VEHICLE HEAD ON. VEHICLE WAS TOTALED, AND DRIVER SUFFERED A HEAD INJURY AND FRACTURED VERTEBRATE. NEITHER AIR BAG DEPLOYED UPON THE FRONTAL IMPACT. PLEASE DESCRIBE DETAILS. *AK
566304	GMC	YUKON	2001		THE VEHICLE HAS BEEN INVOLVED IN TWO ACCIDENTS IN WHICH NEITHER TIME DID THE AIR BAGS DEPLOY,DURING ONE ACCIDENT THE CONSUMER SAYS SHE ALSO DOESNT REMEMBER THE SEAT BELT TIGHTENING CAUSING HER TO STRICK HER HEAD ON THE STEERING WHEEL AND KNEES TO HIT THE DASH. *MJ
878870	GMC	YUKON	2001	2000-12-23	VEHICLE INVOLVED IN A FRONTAL COLLISION AT APPROXIMATELY 75 MPH WITH A FORD ESCORT. UPON IMPACT, BOTH AIR BAGS DID NOT DEPLOY. PASSENGER SUSTAINED A BACK INJURY, AND DRIVER RECEIVED BRUISES TO NECK AND HEAD. DEALER NOTIFIED. FEEL FREE TO PROVIDE ANY FURTHER DETAILS ON THIS MATTER. *AK
883017	GMC	YUKON	2001	2000-10-17	VEHICLE INVOLVED IN A FRONTAL COLLISION WITH A DODGE, NEON , SPEED WAS UNDETERMINED. UPON IMPACT, BOTH AIR BAGS DID NOT DEPLOY. DEALER / MANUFACTURER NOTIFIED, AND NO RESPONSE WAS RECEIVED. PLEASE FEEL FREE TO PROVIDE ANY FURTHER DETAILS ON THIS MATTER. *AK
6900594	GMC	YUKON	2001	2001-09-18	WHILE DRIVING VEHICLE WAS INVOLVED IN AN ACCIDENT, AIR BAGS DID NOT DEPLOY. *AK THE CONSUMER STATED THAT THE VEHICLE WAS HIT VERY HARD. THE IMPACT DAMAGED THE INSTRUMENT PANEL, BROKE THE WINDSHIELD, AND THE FRONT AND REAR PASSENGER DOORS NEEDED REPAIR. *YH
8004110	GMC	YUKON	2001		CONSUMER WAS INVOLVED IN A FRONT END COLLISION AT 70MPH, AND FRONTAL AIR BAGS DID NOT TO DEPLOY. PASSENGER SUSTAINED MAJOR BODY INJURIES.*AK
8004365	GMC	YUKON	2001	2001-12-04	WHILE DRIVING 2 MPH VEHICLE WAS STRUCK ON DRIVER'S DOOR, CAUSING EXTENSIVE DAMAGE TO FRONT END AS WELL. NEITHER AIRBAG DEPLOYED. CONSUMER SUFFERED HEAD INJURIES. DAMAGE TO VEHICLE WAS \$ 10000.00. PRIOR TO THIS, CONSUMER OWNED ANOTHER VEHICLE JUST LIKE THIS ONE. IT ALSO HAD A FRONT CRASH AND AIRBAGS DID NOT DEPLOY. *AK
8006721	GMC	YUKON	2001	2002-03-30	WHILE TURNING LEFT AT 15 MPH\ ANOTHER VEHICLE TRAVELING AT 45 HIT CONSUMER'S VEHICLE ON FRONT DRIVER'S SIDE . UPON IMPACT, AIRBAGS DID NOT DEPLOY. PLEASE PROVIDE ANY FURTHER INFORMATION.*AK
10099161	GMC	YUKON	2001	2004-11-01	THE CONSUMER WAS APPROACHING AN INTERSECTION AND WITHOUT WARNING, ANOTHER DRIVER CUT IN FRONT OF THE CONSUMER VEHICLE. THE DRIVER APPLIED THE BRAKES, BUT THE PEDAL WENT TO THE FLOOR. THIS CAUSED THE OTHER VEHICLE TO COLLIDE INTO ON THE PASSENGER 'S SIDE AND PUSHED THE VEHICLE INTO A TREE. BOTH FRONTAL AIR BAGS DID NOT DEPLOY. THE DRIVER SUSTAINED INJURIES AND WAS TRANSPORTED BY AMBULANCE TO THE HOSPITAL. THE VEHICLE WAS TOWED TO THE DEALER. PLEASE FILL IN ADDITIONAL INFORMATION. *JB
10187683	GMC	YUKON	2001	2007-03-29	TL* - THE CONTACT OWNS A 2001 GMC YUKON WITH A CURRENT AND FAILURE MILEAGE OF 110,000 MILES. THE CONTACT'S VEHICLE WAS INVOLVED IN A CRASH WHILE DRIVING AT 35 MPH, AND THE AIR BAGS DID NOT DEPLOY. THE CRASH TOOK PLACE ON A DRY DAY. THE DRIVER BEGAN CHOKING AND PASSED OUT. THE VEHICLE THEN RAN INTO THE BACK OF A TRUCK SITTING AT A STOP LIGHT. THE FRONT OF THE CONTACTS VEHICLE WAS DAMAGED. THE VEHICLE WAS TOWED TO DEALER. *AK
10587988	GMC	YUKON	2001	2011-05-04	LETTER FROM SENATOR SCOTT ON BEHALF OF CONSTITUENT RE GMC YUKON. *SMD THE CONSUMERS HUSBAND WAS KILLED IN AN ACCIDENT, AND THE AIR BAG DID NOT DEPLOY. *JB

10706540	GMC	YUKON XL	2001	2014-10-17	INITIALLY TRAVELING AT 75 MPH N/B ON HWY 99 IN FRESNO COUNTY, LOST VISION (MEDICAL INCIDENT), WIFE INSISTED I PULL OVER. STRUCK GUARD RAIL ON RIGHT SIDE OF ROAD. SECOND TRY TO PULL OVER CAUSED MY VEHICLE TO IMPACT A VERIZON JUNCTION BOX AND THEN 150 FEET OF SIX-FOOT CHAIN-LINK FENCING WITH ANTI-CLIMB GUARDS THAT CAME OFF THE FENCE AND SHATTERED THE WINDSHIELD. THE AIR BAGS DID NOT DEPLOY. MY INSURANCE AGENT TOLD ME HE WAS GOING TO REPORT THIS INCIDENT TO YOU, BUT SINCE I HAVEN'T HEARD ANYTHING FROM YOU FOLK I'VE ASSUMED MY AGENT DID NOT FOLLOW THROUGH. MY WIFE AND I SUSTAINED ONLY MINOR INJURIES FROM FLYING GLASS. WE HAVE PHOTO'S OF THE VEHICLE. *TR
10127108	ISUZU	RODEO	2001	2005-06-30	DT: THERE WAS AN ACCIDENT AND NO AIRBAGS DEPLOYED. THE CAR WAS EQUIPPED WITH FRONT AIR BAGS. THERE WAS NO WARNING LIGHTS ON TO INDICATE A PROBLEM. LAST TIME THE CAR WAS CHECKED THERE WAS NO INDICATION OF A PROBLEM. THE DRIVER WAS THE ONLY PERSON INJURED WITH A TOOTH KNOCKED OUT. *AK
10155648	ISUZU	RODEO	2001	2006-03-11	I HAD A BLOW OUT ON MY 2001 ISUZU RODEO, CAUSING MY VEHICLE TO GO OFF THE ROAD TO THE RIGHT RUNNING INTO ANOTHER VEHICLE. THE SEAT BELT CAME OFF, THE AIRBAGS DID NOT WORK. I SUSTAINED HEAD INJURIES CAUSING SEIZURES, A DISPLAYED SHOULDER, AND A FRACTURED JAW. DUE TO THE HEAD INJURIES I WAS UNCONSCIOUS AND UNABLE TO KEEP CONTROL OF THE VEHICLE. *NM
10196817	ISUZU	RODEO	2001	2007-07-12	TL*THE CONTACT OWNS A 2001 ISUZU RODEO. WHILE DRIVING 65 MPH WITH THE CRUISE CONTROL ACTIVATED, THE CONTACT WAS INVOLVED IN A HIGH IMPACT VEHICLE CRASH. THE MEDIAN ON THE HIGHWAY SUSTAINED PROPERTY DAMAGE. THE VEHICLE WAS DESTROYED. THE AIR BAGS FAILED TO DEPLOY. THE DEALER HAS NOT BEEN NOTIFIED. THE CONTACT SUSTAINED MODERATE INJURIES TO HIS NECK AND SHOULDERS. A POLICE REPORT WAS FILED. THE CURRENT AND FAILURE MILEAGES WERE 97,000. THE CONSUMER PROVIDED PICTURES OF THE VEHICLE. UPDATED 09/06/07 *TR
10569283	ISUZU	RODEO	2001	2014-03-13	I WAS TURNING ONTO A STREET. THE STREET WAS COVERED IN OIL OR SOME TYPE OF SLICK ELEMENT. I SKIDDED AND FELL INTO A DITCH. MY AIRBAG DID NOT DEPLOY. *TR
10001710	CADILLAC	ESCALADE	2000	2002-12-05	WHILE DRIVING AT 30 MPH VEHICLE WAS INVOLVED IN A HEAD ON COLLISION AND AIRBAGS DID NOT DEPLOY. DEALER CONTACTED. PLEASE PROVIDE ADDITIONAL INFORMATION. TS
10004423	CADILLAC	ESCALADE	2000	2002-12-11	THE CONSUMER HAD AN ACCIDENT THE AIR BAG DIDN'T DEPLOY. *DT
859836	CHEVROLET	ASTRO	2000	2000-04-04	CONSUMER WAS TRAVELING 30MPH WHILE IT WAS RAINING THAT EVENING, AND THERE WAS A SCHOOL BUS IN FRONT OF CONSUMER'S VEHICLE. CONSUMER APPLIED BRAKES AND HIT THE SCHOOL BUS FROM BEHIND. THE COLLISION IMPACT WAS SO HARD THAT VEHICLE MOVED THE SCHOOL BUS. ALSO, THE DUAL AIRBAGS DIDN'T DEPLOY AT ALL. *AK
870742	CHEVROLET	ASTRO	2000	2000-09-01	WHILE DRIVING 55 MPH AND MAKING A TURN HAD A FRONTAL IMPACT. FRONT BUMPER WAS SMASHED AND FELL OFF. ALSO, DRIVER'S AND PASSENGER'S AIRBAGS DID NOT DEPLOY, WHICH DID NOT PROTECT OCCUPANTS IN THIS CRASH. DEALER WAS NOT WILLING TO ASSIST CONSUMER. PLEASE PROVIDE FURTHER INFORMATION. *AK
878344	CHEVROLET	ASTRO	2000	2001-01-17	WHILE DRIVING ABOUT 30 MPH CRASHED INTO ANOTHER VEHICLE THAT CROSSED IN FRONT. UPON IMPACT, BOTH AIR BAGS FAILED TO DEPLOY. CURRENTLY, COMPANY WAS CONCERNED ABOUT PROBLEM WITH AIR BAGS. *AK
879113	CHEVROLET	ASTRO	2000	2000-12-11	A FRONTAL COLLISION AT 20 MPH IMPACT WITH A TREE, AND BOTH AIR BAGS DID NOT DEPLOY. DRIVER SUSTAINED CHEST INJURY. VEHICLE AT BODY SHOP. PLEASE FEEL FREE TO PROVIDE ANY FURTHER DETAILS ON THIS MATTER. *AK
882467	CHEVROLET	ASTRO	2000		CONSUMER WAS INVOLVED IN A FRONTAL COLLISION IN WHICH DRIVER'S AND PASSENGER'S AIR BAGS DID NOT DEPLOY. PLEASE GIVE ANY FURTHER DETAILS. *AK
8000775	CHEVROLET	ASTRO	2000	2001-12-12	WHILE TRAVELING AT 65 MPH, CONSUMER RAN INTO THE SIDE OF ANOTHER VEHICLE, HEAD-ON, UPON IMPACT NEITHER AIR BAG DEPLOYED, CONSUMER CONTACTED DEALER, AND THEY WERE NOT WILLING TO DO ANYTHING. *AK *JG
8001716	CHEVROLET	ASTRO	2000	2002-01-01	CONSUMER HAD A HEAD ON COLLISION AND AIR BAGS DID NOT DEPLOY. CONSUMER WAS INJURED. *AK *JB
8022460	CHEVROLET	ASTRO	2000	2002-11-07	CONSUMER STATES THAT WHILE ON AN EXPRESS WAY, CONSUMER REAR ENDED A TANKER TRUCK. CONSUMERS VEHICLE WAS TOTALLED. CONSUMER STATES' NONE OF THE VEHICLES AIRBAGS DEPLOYED. PLEASE PROVIDE ANY FURTHER INFORMATION. TS
10051329	CHEVROLET	ASTRO	2000	2003-12-16	CHECY ASTRO CARGO VAN 2000, FRONTAL COLLISION RESULTING IN TOTAL LOSS BY INSURANCE CARRIER. NEITHER FRONT AIR BAG OPERATED.
736342	CHEVROLET	BLAZER	2000	2000-07-21	IN A HEAD-ON COLLISION WITH A GUARDRAIL, BOTH FRONT AIR BAGS FAILED TO DEPLOY. *AK
877186	CHEVROLET	BLAZER	2000		CONSUMER WAS DRIVING AT APPROXIMATELY 30-35 MPH ,AND TO AVOID A CRASH CONSUMER RAN INTO A TREE HEAD-ON. UPON IMPACT, DUAL AIRBAGS DID NOT DEPLOY, CAUSING INJURIES. *AK
8013283	CHEVROLET	BLAZER	2000	2002-07-02	CONSUMER STATES AT A 25MPH VEHICLE CRASHED, HOWEVER THE AIRBAGS DID NOT DEPLOY. CAUSE UNKNOWN. DEALER NOTIFIED. *JB CONSUMER ADDS VEHICLE WAS STRUCK HEAD ON BY AN OUT OF CONTROL VEHICLE TRAVELING 45 MILES. THE RIGHT FRONT FENDER CONTACTED SQUARELY AGAINST CONSUMERS FRONT BUMPER. RESULTING IMPACT TOTALLED CONSUMERS BLAZER. INSPECTORS WERE AMAZED THAT AIR BAGS DID NOT DEPLOY. *TT
8014195	CHEVROLET	BLAZER	2000		WHILE DRIVING 25-30 MPH AND WITHOUT WARNING INVOLVED IN A HEAD-ON COLLISION. UPON IMPACT, AIR BAGS DID NOT DEPLOY. DEALER HAS BEEN NOTIFIED. *AK THERE WERE 2 INJURIES. *YH

8015817	CHEVROLET	BLAZER	2000		WHILE DRIVING 25 MPH ANDWITHOUT WARNING A HEAD ON COLLISION OCCURRED. UPON IMPACT, AIR BAGS DID NOT DEPLOY, AND DRIVER SUSTAINED MINOR INJURIES.*AK
8022825	CHEVROLET	BLAZER	2000	2002-11-01	FRONT CRASH AT 40 MPH, VEHICLE HIT A TREE. NEITHER AIRBAG DEPLOYED, DRIVER SUFFERED MINOR INJURIES. AMOUNT OF DAMAGE UNKNOWN AT THIS TIME. TS
10006273	CHEVROLET	BLAZER	2000	2003-02-01	VEHICLE WAS IN A FRONTAL COLLISION, BUT NONE OF THE AIRBAG DEPLOYED UPON IMPACT. THE DRIVER SUSTAINED HEAD,NECK AND BACK INJURIES. PLEASE PROVIDE MORE DETAILS.
10014969	CHEVROLET	BLAZER	2000	2003-03-15	THE VEHICLE WAS INVOLVED IN A FRONTAL ACCIDENT, AND NONE OF THE AIR BAGS DEPLOYED. *JB
10015762	CHEVROLET	BLAZER	2000	2003-04-12	WHILE DRIVING 45 MPH THE VEHICLE WAS INVOLVED IN A COLLISION BUT THE AIR BAGS DID NOT DEPLOY. *NLM
10016961	CHEVROLET	BLAZER	2000	2003-04-08	HEAD ON COLLISION WITH SOLID CEMENT BRIDGE AT 40+ MPH. AIR BAGS DID NOT DEPLOY, SEAT BELTS DID NOT LOCK IN PLACE ON IMPACT NOR DURING ROLL OVER ON MY 2000 CHEVY BLAZER. *JB
10059300	CHEVROLET	BLAZER	2000	2004-02-07	WHILE DRIVING 45 MPH THE DRIVER DROVE OVER SOME BLACK ICE AND LOST CONTROL OF THE VEHICLE. THE VEHICLE RAN INTO AN EMBANKMENT HEAD ON. THE CONSUMER STATED THAT NEITHER OF THE FRONTAL AIR BAGS DEPLOYED. THE CONSUMER CONTACTED THE DEALER. *NM
10106730	CHEVROLET	BLAZER	2000	2004-12-14	WHILE DRIVING 55 MPH THE CONSUMER WAS INVOLVED IN FRONTAL COLLISION. UPON IMPACT, THE AIR BAGS DID NOT DEPLOY. THE DRIVER SUSTAINED MAJOR NECK,BACK , AND HIP INJURIES. THE VEHICLE WAS TOTALED. *AK (SEE ALSO ODI REF. NO. 10106755 - SAME VEHICLE) *MJJ *TC
10108627	CHEVROLET	BLAZER	2000	2005-01-18	THE TRUCK SLID ON A PATCH OF ICE 100 YARDS AFTER MERGING ONTO THE INNER STATE. THIS RESULTED IN THE CONSUMER LOSING CONTROL OF THE TRUCK. THE TRUCK FRONT DRIVER SIDE IMPACTED A CONCRETE BRIDGE; THEN SWUNG AROUND;THE REAR DRIVER SIDE HIT THE BRIDGE; THIS THREW THE TRUCK INTO THE RIGHT HAND LANE, INTO THE GUARD RAIL , IMPACTING THE FRONT PASSENGER SIDE; THEN THE TRUCK BOUNCED TO THE LEFT HAND LANE AND IMPACTED THE GUARD RAIL HEAD ON. NONE OF THE AIR BAGS DEPLOYED UPON IMPACT. THE DRIVER SUSTAINED SEVERE INJURIES TO THEIR NECK, BACK, AND LEFT SHOULDER. *NM
10132243	CHEVROLET	BLAZER	2000	2005-08-06	T-BONE COLLISION, APPROXIMATELY 45 MPH. FRONT END OF VEHICLE BADLY DAMAGED. NO AIRBAG DEPLOYMENT. *NM
10226626	CHEVROLET	BLAZER	2000	2008-04-30	THE CONTACT'S SPOUSE OWNS THE 2000 CHEVROLET BLAZER. THE CONTRACT STATE THAT THIS DAUGHTER WAS DRIVING APPROXIMATELY 30 MPH, THEN SHE HIT A DIVIDER AND THE VEHICLE ROLLED OVER SEVERAL TIMES LANDING ON THE DRIVERS SIDE OF THE VEHICLE. NEITHER AIR BAR DEPLOYED. THE DRIVER WAS INJURIES AND THE VEHICLE WAS TOTALED BY THE INSURANCE COMPANY. THE CURRENT AND FAILURE MILEAGE IS 85210. JP
10609197	CHEVROLET	BLAZER	2000	2013-07-10	HAD A FRONT END COLLISION. THE FRONT END WAS DESTROYED. NO AIR BAGS WENT OFF. BOTH VEHICLES CAME OFF A RED LIGHT, ALL VEHICLES STOPPED SUDDENLY AND MY TEUCK REAR ENDED A TOYOTA PICKUP. *TR
10693647	CHEVROLET	BLAZER	2000	2015-01-31	TL* THE CONTACT OWNED A 2000 CHEVROLET BLAZER. WHILE DRIVING AT APPROXIMATELY 45 MPH, THE VEHICLE CRASHED HEAD ON INTO ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. A POLICE REPORT WAS FILED AND NO INJURIES WERE REPORTED. THE VEHICLE WAS DESTROYED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 120,650.
731125	CHEVROLET	SILVERADO	2000	1999-10-23	A CAR ATTEMPTED TO TURN IN FRONT OF US, HE DID NOT MAKE IT. WE WERE TRAVELING BETWEEN 38-40 MPH WHEN WE HIT THE OTHER VEHICLE HEAD ON. AIRBAGS DID NOT DEPLOY ON EITHER SIDE OF THE VEHICLE. THE TRUCK WAS TOTAL LOSS. THE OTHER PARTY'S VEHICLE ALSO WAS A. *AK
734605	CHEVROLET	SILVERADO	2000	2000-09-19	I CONTACTED SARAH SCHILLE OF GENERAL MOTORS ABOUT THIS FAILURE.SHE SENT AN INVESTIGATOR TO TOM BENSON TO LOOK AT THE TRUCK. HE DID WHATEVER HE DOES TO COLLECT DATA FROM THE VEHICLE AND THEN TAKES PICTURES ETC. AND SENDS ALL OF THE INFORMATION TO GM FOR EVALUATION. I FEEL THIS ACCIDENT WAS SEVERE ENOUGH FOR THE AIRBAGS DEPLOY AND I'M NOT SATISFIED AT ALL WITH GM'S RESPONSE TO THE SITUATION. I REQUESTED THE REPORT AND A COPY OF THE DEPLOYMENT CRITERIA FOR THE AIRBAGS I WAS TOLD THAT INFORMATION WILL NOT BE SUPPLIED. HOW AM I TO KNOW IF THIS IS A FAILURE OR NOT. THIS INFORMATION SHOULD NOT BE PRIVATE TO THE MANUFACTURER ONLY. I WANT SOMEONE TO LOOK INTO THIS PROBLEM.
739117	CHEVROLET	SILVERADO	2000	2001-01-02	HIT A GUARD RAIL HEAD ON, WENT OVER IT AND NOSE DIVED INTO A 10FT. DEEP DITCH, FLIPPING ONTO THE ROOF. NEITHER AIRBAG DEPLOYED AFTER HITTING THE FRONT END TWICE.*AK
745943	CHEVROLET	SILVERADO	2000	2001-05-19	MY 2000 CHEVROLET SILVERADO TRUCK WAS INVOLVED IN A HEAD-ON COLLISION ON MAY 19, 01. VEHICLE WAS TRAVELING AT APPROXIMATELY 40 MPH. WHEN VEHICLE WAS STRUCK HEAD-ON AND KNOCKED APPROXIMATELY 23 FT. BACKWARDS ONTO THE SHOULDER OF ROADWAY. UPON IMPACT DRIVER SIDE AIRBAG DID NOT DEPLOY. DRIVER OF TRUCK RECIEVED CONUSIONS, ABRASIONS, AND BRUISING RESULTING FROM CONTACT WITH STEERING COLUMN AND DASH PANEL. BOTH VEHICLES INVOLVED IN CRASH WERE DETERMINED TO BE TOTAL LOSSES.*AK

766686	CHEVROLET	SILVERADO	2000	2002-08-22	THE 2000 CHEVROLET SILVERADO CRASHED HEAD ON INTO A TREE, THE AIRBAGS DID NOT DEPLOY. THE DRIVER, DAKOTA KANETZKY, HAD NUMEROUS FACIAL FRACTURES CAUSED WHEN HIS HEAD HIT AND CRACKED THE WINDSHIELD. HE WAS HOSPITALIZED FOR 5 DAYS AND IS STILL UNDER A DOCTOR'S CARE.*AK
767253	CHEVROLET	SILVERADO	2000		AIR BAGS DID NOT DEPLOY ON RIGHT FRONT COLLISION WITH CONCRETE WALL, *AK
860353	CHEVROLET	SILVERADO	2000	2000-01-19	HEADING SOUTH ON HIGHWAY US 1, TRAVELING 55MPH WITH CRUISE CONTROL ON, ANOTHER VEHICLE COMING NORTH TURNED IN FRONT, AND CONSUMER HIT VEHICLE ON THE SIDE. UPON IMPACT, DRIVER'S SIDE AIRBAG DID NOT DEPLOY. CONTACTED DEALER, AND HE WAS NOT ABLE TO HELP. *AK
871368	CHEVROLET	SILVERADO	2000	2000-09-08	DRIVER HAD LOST CONTROL OF VEHICLE HIT A TELEPHONE POLE HEAD-ON WITH A 50-65 MPH IMPACT, AND THEN DROVE INTO A FIELD. UPON IMPACT, DUAL AIRBAGS DID NOT DEPLOY, BUT SEATBELTS WERE ON AT THE TIME. AS A RESULT, PASSENGER HAD CRACKED STERNUM, AND DRIVER HAD MILD WHIPLASH. PLEASE PROVIDE FURTHER INFORMATION. *AK
872110	CHEVROLET	SILVERADO	2000		CONSUMER WAS INVOLVED IN 55 MPH FRONTAL COLLISION IN WHICH DRIVER'S AND PASSENGER'S AIR BAGS DID NOT DEPLOY. ALSO, FRONT END WAS HEAVILY DAMAGED. PLEASE GIVE ANY FURTHER DETAILS.*AK
872528	CHEVROLET	SILVERADO	2000	2000-04-29	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH A TREE AT 20 MPH, AND BOTH AIR BAGS DID NOT DEPLOY. DEALER/MANUFACTURER WERE NOT NOTIFIED AT THIS TIME. PLEASE FEEL FREE TO PROVIDE ANY FURTHER DETAILS. *AK
878288	CHEVROLET	SILVERADO	2000		WHILE TRAVELING AT SPEED 45 MPH WHEN REAR ENDED ANOTHER VEHICLE. UPON IMPACT, DRIVER'S AIR BAG DID NOT DEPLOY. *AK
886000	CHEVROLET	SILVERADO	2000	2001-04-08	CONSUMER WAS TRAVELING AT APPROXIMATELY 60 MPH WHEN A TRAFFIC JAM AHEAD OF HIM OCCURRED. CONSUMER APPLIED BRAKES AND ATTEMPTED TO SLOW DOWN. BRAKES FAILED TO SLOW VEHICLE DOWN, AND REAR ENDED A VEHICLE IN FRONT OF HIM ON FRONT DRIVERS SIDE OF VEHICLE. BOTH FRONTAL AIRBAGS FAILED TO DEPLOY. PLEASE PROVIDE ANY ADDITIONAL INFORMATION/ATTACHMENTS.*AK
887723	CHEVROLET	SILVERADO	2000	2001-04-23	WAS TRAVELING 60MPH AND LOST CONTROL OF VEHICLE DUE TO ITS DRIFTING. IT WENT SIDEWAYS AND OFF THE ROAD. THEN, VEHICLE WENT AIR BORNE AFTER STRADDLING. DRIVEWAY WAS OF CONCRETE TILE. LANDED ON BUMPER, THEN FLIPPED ON TOP. AIR BAGS FAILED TO DEPLOY. DRIVER SUFFERED INJURIES AND WAS HOSPITALIZED.*AK
891918	CHEVROLET	SILVERADO	2000	2001-06-13	WHILE TRAVELING AT APPROXIMATELY 45 TO 50 MPH VEHICLE IMPACTED ANOTHER VEHICLE, CAUSING \$11,000 WORTH OF DAMAGE TO FRONT OF TRUCK. UPON IMPACT, DRIVER'S AIR BAG FAILED TO DEPLOY WHILE PASSENGER'S AIR BAG WAS TURNED OFF. INSURANCE COMPANY WAS HAVING VEHICLE REPAIRED. PLEASE PROVIDE ANY ADDITIONAL INFORMATION/ATTACHMENTS. *DRIVER EXPERIENCED NECK INJURIES AND STIFF NECK. *AK
892771	CHEVROLET	SILVERADO	2000	2001-06-28	HEAD COLLISION AT 60-65MPH, AND AIR BAGS DID NOT DEPLOY. THERE WAS NO PRIOR WARNING. CONTACTED MANUFACTURER, AND MANUFACTURER WAS NOT WILLING TO DO ANYTHING.*AK
893040	CHEVROLET	SILVERADO	2000	2001-06-25	WHILE DRIVING 30 TO 35 MPH HAD A CRASH, AND AIRBAGS DID NOT DEPLOY. DAMAGED FRONT END OF TRUCK. CONTACTED DEALER. *AK
895573	CHEVROLET	SILVERADO	2000	2001-08-29	CONSUMER WAS TRAVELING ABOUT 40MPH ON HIGHWAY AND THERE WAS OIL ON HIGHWAY. CONSUMER LOST CONTROL OF THE VEHICLE, AND IT HIT A GUARDRAIL. UPON IMPACT, DRIVER'S SIDE AIRBAG DIDN'T DEPLOY. DEALERSHIP WAS AWARE OF PROBLEM. *AK DRIVER RECEIVED BACK AND NECK INJURIES. *SLC
8001868	CHEVROLET	SILVERADO	2000	2001-12-18	CONSUMER STATED VEHICLE WAS INVOLVED IN A FRONTAL CRASH OF 30 MPH, AND THE AIR BAGS DID NOT DEPLOY, DEALER DID NOT CHECK VEHICLE, BECAUSE GM WOULD NOT GIVE THEM PERMISSION. *AK *JG
8001872	CHEVROLET	SILVERADO	2000	2001-12-11	WHILE DRIVING, VEHICLE WAS INVOLVED IN AN ACCIDENT. UPON IMPACT, AIR BAG ON DRIVER/PASSENGER SIDE DID NOT DEPLOY, DRIVER WAS INJURED. *AK *YH
8014186	CHEVROLET	SILVERADO	2000	2002-07-03	WHILE DRIVING WAS HIT HEAD-ON BY ANOTHER VEHICLE AND BOTH DRIVER AND PASSENGERS AIRBAGS DID NOT DEPLOY. CONSUMER WAS DRIVING APPROXIMATELY 30MPH, AND THE OTHER VEHICLE WAS DRIVING APPROXIMATELY 40-50MPH.*AK THERE WERE 2 INJURIES. *YH
8016756	CHEVROLET	SILVERADO	2000	2002-08-04	IN A FRONTAL COLLISION, VEHICLE ROLLED 4 TIMES. UPON IMPACT, NONE OF THE AIR BAGS DEPLOYED.*AK
8017393	CHEVROLET	SILVERADO	2000	2002-08-25	VEHICLE INVOLVED WAS IN A FRONTAL COLLISION WITH A TREE, UPON IMPACT AIR BAGS DID NOT DEPLOY. VEHICLE WAS TRAVELING APPROXIMATELY 40MPH.*AK CONSUMER STATED THE ROAD WAS UNEVEN AND THE RIGHT SIDE TIRES WAS CAUGHT IN A WASHOUT, CONSUMER TRIED TO BRING THE TIRES BACK ON THE ROAD BUT OVERCORRECTED, THE VEHICLE THEN BEGAN TO FISHTAIL AFTER COMING BACK ON THE ROAD, SLID ACROSS THE HIGHWAY AND HIT A TREE, THE DRIVER SUFFERED INJURIES.*JB
8017521	CHEVROLET	SILVERADO	2000	2002-08-01	WHILE TRAVELING AT 55 MPH LOST CONTROL OF VEHICLE AND HIT A CONCRETE DIVIDER, VEHICLE WAS AIRBORNE AND LANDED ON DRIVER'S SIDE. NONE OF THE AIRBAGS DEPLOYED, AND CONSUMER SUSTAINED LEG INJURY. PLEASE PROVIDE ANY FURTHER INFORMATION.*AK
8018038	CHEVROLET	SILVERADO	2000		UPON A FRONTAL IMPACT AT ESTIMATED SPEED OF 55 MPH, NEITHER DUAL AIR BAG DEPLOYED. CHEVROLET TOLD CONSUMER THAT AIR BAGS DEPLOY IN CERTAIN SITUATIONS. OWNER HAS RECEIVED A RECALL NOTICE FOR AIR BAGS. PLEASE DESCRIBE DETAILS. *AK

8022592	CHEVROLET	SILVERADO	2000	2002-09-28	CONSUMER WAS TRAVELING AROUND A CURVE, CONSUMER SUDDENLY LOST CONTROL OF VEHICLE. CONSUMER STATES VEHICLE SLAMMED INTO A TREE AND NONE OF THE AIRBAGS DEPLOYED. PLEASE PROVIDE ANY FURTHER INFORMATION. MR
8023044	CHEVROLET	SILVERADO	2000	2002-11-06	VEHICLE WAS IN A FRONT COLLISION AND NONE OF THE AIR BAGS DEPLOYED UPON IMPACT. NONE OF THE OCCUPANTS IN THE VEHICLE WERE SERIOUSLY INJURED AT TIME OF THE ACCIDENT. PLEASE PROVIDE MORE DETAILS. TS
10005962	CHEVROLET	SILVERADO	2000		AIR BAGS FAILED TO DEPLOY IN A COLLISION, RESULTING IN A FATALITY. *AK *JB
10008044	CHEVROLET	SILVERADO	2000	2003-01-26	AIR BAGS FAILED TO DEPLOY FROM FRONTAL IMPACT DURING MOTOR VEHICLE ACCIDENT
10008151	CHEVROLET	SILVERADO	2000	2003-02-16	THE VEHICLE WAS INVOLVED IN AN ACCIDENT, AND THE AIR BAG FAILED TO DEPLOY.*JB
10022039	CHEVROLET	SILVERADO	2000	2003-04-11	THE VEHICLE WAS INVOLVED IN FRONTAL COLLISION, AND THE AIR BAGS FAILED TO DEPLOY. THE CONSUMER WAS INJURED. *AK *TS *JB
10027230	CHEVROLET	SILVERADO	2000	2003-06-16	THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WHILE DRIVING AT 40 MPH AND NONE OF THE AIR BAGS DEPLOYED UPON IMPACT. DRIVER IMPACTED THE STEERING WHEEL, AND DRIVER'S SIDE SEAT BELT DIDN'T RETRACT.*AK *PH *JB
10029556	CHEVROLET	SILVERADO	2000	2003-07-17	WHILE DRIVING AT 45MPH CONSUMER HAD A FRONT COLLISION ,AND NEITHER OF THE FRONT BAGS DEPLOYED.*AK
10044432	CHEVROLET	SILVERADO	2000		AIR BAGS DID NOT DEPLOY WHEN VEHICLE STRUCK A TREE HEAD ON. VEHICLE WAS TRAVELING AT 40 MPH. DRIVER WAS INJURED. *AK
10045511	CHEVROLET	SILVERADO	2000	2003-09-28	I REARENDED A VEHICLE THAT WAS SITTING STILL IN THE MIDDLE OF THE ROAD, I WAS TRAVELING ABOUT 40-45 MPH, AND NEITHER AIR BAG DEPLOYED. I WAS SHIFTED IN THE VEHICLE AND HAVE KNEE AND BACK PROBLEMS. *LA
10081392	CHEVROLET	SILVERADO	2000	2004-06-22	WHILE DRIVING 45-55 MPH CONSUMER'S VEHICLE WAS REAR-END BY A TRACTOR TRAILER. PUSHING CONSUMER'S VEHICLE OFF ROAD AND INTO A DITCH, FRONT END FIRST. UPON IMPACT, AIR BAGS DID NOT DEPLOY. *AK BOTH THE DRIVER AND THE PASSENGER SUSTAINED INJURIES. THE DRIVER INJURED HIS NECK, BACK, HIPS AND PELVIS. THE PASSENGER INJURED HER RIGHT SHOULDER, CHEST, BACK AND HIPS.
10101301	CHEVROLET	SILVERADO	2000	2004-11-02	CONSUMER'S VEHICLE WAS INVOLVED IN A HEAD ON COLLISION WHILE DRIVING AT 25-30 MPH. UPON IMPACT, AIR BAGS DID NOT DEPLOY. RECALL 02V178000 WAS ISSUED. MANUFACTURER WAS NOT WILLING TO ASSIST THE CONSUMER. *AK
10108404	CHEVROLET	SILVERADO	2000	2005-01-11	THE EVENT WAS A CAR PULLED OUT IN FRONT OF ME WHICH STILL HIT THE DRIVER'S SIDE OF MY VEHICLE (2000 CHEVY SILVERADO). THEN MY TRUCK HAD A FULL FRONTAL IMPACT AT GREATER THAN 30 MPH INTO A DIRT WALL IN WHICH NEITHER THE DRIVER'S NOR PASSENGER'S AIRBAGS DEPLOYED (THE TRUCK IS TOTALLED). I HIT THE STEERING WHEEL AND GOT A CONCUSSION WITH BLOOD AROUND THE BRAIN, A BROKE CHEEK BONE, AND FRACTURED HIP. MY WIFE WAS 33 WEEKS PREGANANT AT THE TIME AND HER WATER BROKE AND SHE GOT A COMPOUND FRACTURE IN THE LOWER LEG/ANKLE. AS A RESULT OF THE WATER BREAKING MY SON WAS BORN 3 DAYS LATER 7 WEEKS PREMATURE. AS FOR WHAT WAS DONE TO CORRECT THE PROBLEM I'M HOPING IT WILL AT LEAST BE INVESTIGATED TO MAKE SURE THIS IS NOT A SYSTEMIC PROBLEM (I.E. SOFTWARE SCREWUP SOMETHING NOT HOOKED UP RIGHT IN THE AIRBAG SYSTEM ETC). I HAVE PICS OF THE TRUCK AND THE CRASH SITE I CAN SEND IF NECESSARY. I CAN ALSO PROVIDE THE LOCATION OF THE TRUCK SO IT CAN BE INSPECTED.*AK
10111181	CHEVROLET	SILVERADO	2000	2004-12-23	RECALL CAMPAIGN 02V078 00 CONCERNING AIR BAG SENSING MODULE. CONSUMER'S VEHICLE WAS INVOLVED IN A REAR END COLLISION, IT CRASHED INTO ANOTHER VEHICLE IN FRONT AT 50 MPH. UPON IMPACT, NEITHER FRONTAL AIR BAG DEPLOYED. CONSUMER SUSTAINED INJURIES, AND WAS TRANSPORTED TO THE LOCAL HOSPITAL BY AMBULANCE. DEALER AND MANUFACTURER WERE NOTIFIED. *AK
10113830	CHEVROLET	SILVERADO	2000	2005-03-08	WHILE DRIVING 20 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A FRONTAL COLLISION. UPON IMPACT, BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. VEHICLE WAS TOWED TO A GARAGE FOR INSPECTION. THE CAUSE HAD NOT BEEN DETERMINED AT THIS TIME. THIS INFORMATION WAS PROVIDED BY RICKY'S WIFE KAREN FLIMP. *AK
10120946	CHEVROLET	SILVERADO	2000	2005-05-06	I WAS IN A HEAD ON COLLISION AND RECEIVED A COMPOUND FRACTURE TO MY RIGHT FEMUR BONE, 2 BLACK EYES AND FRACTURED RIBS DUE TO THE INACTIVATION OF THE DRIVERS AND PASSENGER AIRBAG MODULES, ALSO THE STEERING WHEEL BENT RESEMBLING AN AIRPLANE WHEEL. MY WIFE CHECKED THE INTERNET AFTER THE INCIDENT AND FOUND THERE WAS A RECALL FOR THE AIRBAG MODULE ON THE YEAR OF MY 2000 CHEVROLET SILVERADO TRUCK. WE WERE NEVER NOTIFIED OF THIS BEFORE THE INCIDENT, BUT ARE CURRENTLY RECEIVING UPDATES TODAY. DO NOT UNDERSTAND WHY WE WERE NEVER NOTIFIED OF THIS. THE TRUCK IS NOW IN A STORAGE YARD AND WE ARE AWAITING THE RESPONSE FROM THE INSURANCE ADJUSTOR.
10122067	CHEVROLET	SILVERADO	2000	2005-03-19	OFF CENTER HEAD ON CRASH WITH 2 SIMILAR 2000 CHEVY SILVERADO EXTENDED CAB PICK UP TRUCKS. ESTIMATED IMPACT SPEED 90 MPH (60 MPH VEHICLE 2, 30 MPH VEHICLE 1 PER CHP REPORT) NO AIRBAG DEPLOYMENT OF EITHER VEHICLE.
10128831	CHEVROLET	SILVERADO	2000	2005-07-01	AIR BAGS DID NOT DEPLOY UPON IMPACT
10137048	CHEVROLET	SILVERADO	2000	2005-09-11	DT: CONSUMER'S VEHICLE WAS INVOLVED IN A CAR ACCIDENT ON SEPTEMBER 11, 2005 WHILE DRIVING 50-55 MPH. IT WAS A HEAD ON COLLISION. UPON IMPACT, DRIVER'S SIDE AIR BAG DID NOT DEPLOY. THE CONSUMER HAD NOT CONTACTED THE DEALER OR MANUFACTURER. *AK

10139984	CHEVROLET	SILVERADO	2000	2005-06-17	DT: THE CONTACT'S SON WAS INVOLVED IN AN ACCIDENT ON 6-17-05. THE CONTACT RECEIVED A COPY OF THE CRASH REPORT. UPON IMPACT, NEITHER AIR BAG DEPLOYED. THE VEHICLE HIT SEVERAL TREES. THE POLICE REPORT STATED THE SPEED LIMIT WAS 55 MPH. THE PASSENGER'S HEAD WENT THROUGH THE WINDSHIELD, BUT PASSENGER WAS NOT SERIOUSLY HURT. NEITHER THE DRIVER NOR THE PASSENGER HAD TO GO TO THE HOSPITAL. THE CONTACT REPORTED THAT AIR BAG LIGHT ILLUMINATED IN THE CAR PRIOR TO THE INCIDENT. THE INSURANCE COMPANY HAS BEEN NOTIFIED. THE TRUCK WAS TOTALED. THE CONTACT TOOK PICTURES OF THE PINE TREE THAT WAS EMBEDDED IN THE HOOD. UPDATED 11/15/05. *JB
10199593	CHEVROLET	SILVERADO	2000	2007-08-10	TL*THE CONTACT OWNS A 2000 CHEVROLET SILVERADO. WHILE DRIVING 30 MPH HE DEPRESSED THE BRAKES AND CRASHED INTO THE VEHICLE IN FRONT OF HIM. THE AIR BAGS DID NOT DEPLOY. THE FRONT SEAT PASSENGER SUSTAINED A LACERATED SPLEEN AND CONTUSION OF THE HEART. A COMPLAINT WAS SUBMITTED TO THE MANUFACTURER (COMPLAINT # 71-546827970). THE CURRENT AND FAILURE MILEAGES WERE 128,000. UPDATED 02-01-08 *BF UPDATED 02/01/08 *TR
10328507	CHEVROLET	SILVERADO	2000	1901-01-01	CONSUMER STATES THAT AIRBAGS DID NOT DEPLOY DURING ACCIDENT IN A 2000 CHEVROLET SILVERADO CAUSING SERIOUS INJURY. *GR
878851	CHEVROLET	SUBURBAN	2000	2000-12-11	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT 60MPH. UPON IMPACT, AIRBAGS DID NOT DEPLOY. VEHICLE ROLLED OVER, AND VEHICLE EXPLODED. THERE WERE MINOR INJURIES.*AK
8002321	CHEVROLET	SUBURBAN	2000		WHILE DRIVING AT 25 MPH AN ACCIDENT OCCURRED, AND SEATBELT DID NOT TIGHTEN/ AIRBAG DID NOT DEPLOY. . PLEASE PROVIDE ANY FURTHER INFORMATION, AND IDENTIFICATION NUMBER.*AK
8017775	CHEVROLET	SUBURBAN	2000		A TIRE SHEARED OFF, ANOTHER TRUCK CROSSING MEDIAN BEGAN HEADING STRAIGHT TO CONSUMER'S VEHICLE. DRIVER ATTEMPTED TO MANUEVER, BUT RAN OFF THE ROAD. UPON FRONTAL OFF CENTERED IMPACT AT 60 MPH, AND DUAL AIR BAGS FAILED TO DEPLOY.*AK
557967	CHEVROLET	TAHOE	2000	2000-09-01	RIGHT FRONT TIRE (NO MAKE OR MODEL PROVIDED) EXPERIENCED A BLOWOUT, CAUSING THE VEHICLE TO GO OFF THE ROAD, COME BACK ONTO THE ROADWAY, AND CRASH INTO A CEMENT WALL, THE CONSUMER STATED THAT HE BELIEVED THE BACK RIGHT TIRE EXPERIENCED A BLOWOUT AS WELL, DURING THE CRASH THE AIRBAG EXPERIENCED A NO DEPLOYMENT, ONE PERSON WAS INJURED DUE TO THE INCIDENT. (OHIO TRAFFIC CRASH REPORT) *SLC
563859	CHEVROLET	TAHOE	2000	2001-10-03	THE CONSUMER WAS INVOLVED IN A MAJOR ACCIDENT BUT THE DRIVER SIDE AIR BAGS FAILED TO DEPLOY. THE CONSUMER SUFFERED INJURIES. *YH
567545	CHEVROLET	TAHOE	2000	2000-11-11	CONSUMER WAS IN TWO ACCIDENTS. ONE IN NOVEMBER OF 2000 AND THE OTHER IN SEPTEMBER OF 2002. THE AIR BAGS DID NOT DEPLOY IN EITHER INCIDENT. CONSUMER DESCRIBED THE INCIDENTS TO A REPRESENTATIVE OF GENERAL MOTORS. CONSUMER WAS INFORMED THAT THE AIR BAGS SHOULD NOT HAVE DEPLOYED, IN THE FIRST ACCIDENT THERE WAS ONE INJURY, IN THE SECOND ACCIDENT, THERE WERE TWO INJURIES. *JG
740413	CHEVROLET	TAHOE	2000	2001-02-01	HEAD ON COLLISION, IMPACT ON FRONT RIGHT SIDE, HIT AND SHEARED IN HALF A WOODEN UTILITY POLE, NO AIR BAG DEPLOYMENT ON EITHER SIDE, BUMPER IS CURLED UNDER FRONT END OF VEHICLE. *AK
767411	CHEVROLET	TAHOE	2000	2001-11-11	ON NOVEMBER 11,2000 I HAD A HEAD ON COLLISION (NOT MY FAULT) AND THE AIRBAGS DIDN'T DEPLOY. THEN ON SEPT 1,02 WE HAD A ACCIDENT ON INTERSTATE 95 THAT WE TOTALED THE TAHOE AND THE BODY SHOP CALLED GM SINCE THE AIRBAGS DIDN'T DEPLOY AGAIN. MR. LATTERMERE FROM GM CALLED ME AND TOLD ME OVER THE PHONE AFTER I DESCRIBE THE ACCIDENT TO HIM THAT , AS HE DREW A PICTURE ON PAPER, "THAT THE AIR BAGS SHOULDN'T HAVE DEPLOYED". I FIND IT VERY DIFFICULT THAT A PERSON CAN DRAW A PICTURE AND TELL ME THIS. I WOULD LIKE FOR YOUR ORGANIZATION TO INSPECT THIS VEHICLE AND RETRIEVE THE COMPUTER INFORMATION AND LET ME KNOW WHAT YOU THINK. GM SENT AN "INDEPENDENT" INSPECTOR OUT TO DO A REPORT BUT I HAVE NOTHING FROM HIM OR GM ON THE FINDING. I HAVE LEFT MESSAGES FOR MR. LATTERMERE TO CALL ME TO NO AVAIL.*AK
8018021	CHEVROLET	TAHOE	2000	2002-09-01	CONSUMER STATES WHILE DRIVING 55MPH HIT CONCRETE DIVIDER AND AIR BAGS DID NOT DEPLOY.*JB
10111305	CHEVROLET	TAHOE	2000	2005-01-02	WHILE DRIVING CONSUMER HIT A PATCH OF ICE WHICH SENT THE VEHICLE SLIDING, AND CAUSING AN ACCIDENT. HOWEVER, THE AIR BAGS DID NOT DEPLOY, AND CONSUMER WAS INJURED. CONSUMER CONTACTED THE DEALER, AND MANUFACTURER. *AK CONSUMER FEELS THAT MUCH OF THE PAIN AND SUFFERING MIGHT HAVE BEEN PREVENTED BY THE PROTECTION OF THE 4 AIR BAGS IN THIS TAHOE-NONE OF WHICH DEPLOYED UPON AN IMPACT THAT CRUSHED THE FRONT OF THE VEHICLE. JAMMED THE FRONT PASSENGER DOOR WHICH CONSUMER COULD NOT OPEN , AND BENT THE CAR'S FRAME BEYOND REPAIR. *BF
10150002	CHEVROLET	TAHOE	2000	2006-02-08	I WAS RECENTLY IN AN ACCIDENT AND MY 2 CHILDREN WERE IN THE VEHICLE WITH ME. I WAS IN A 5 CAR WRECK IN WHICH MY VEHICLE, AND THE ONE IN FRONT OF ME WERE TOTALED. UPON IMPACT ON THE FRONT OF MY TRUCK, MY AIR BAGS DIDN'T DEPLOY NOR DID MY SEAT BELTS LOCK. MY 11 YR OLD HIT HIS HEAD ON THE DASH, REQUIRING IMMEDIATE MEDICAL ATTENTION FOR A SEVERE LACERATION WHICH REQUIRED STITCHES. I LEARNED FROM GMC THERE WAS A RECALL ON MY TRUCK FOR AIR BAG MALFUNCTIONS AND I WAS NEVER NOTIFIED. *NM

10249443	CHEVROLET	TAHOE	2000	2008-11-05	TL*THE CONTACT OWNS A 2000 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 35 MPH, THE VEHICLE CRASHED INTO A LAMP POST THAT WAS SURROUNDED BY CEMENT. THE FRONT END WAS PUSHED IN, WHICH CAUSED THE ENGINE TO SHIFT. THE AIR BAGS FAILED TO DEPLOY AND THE DRIVER SUSTAINED INJURIES TO HIS BACK AND NECK. THE VEHICLE WAS TOWED TO A LOCAL REPAIR SHOP AND THE MECHANIC STATED THAT THE AIR BAGS SHOULD HAVE DEPLOYED. THE DEALER WAS NOT NOTIFIED. THE MANUFACTURER FILED A CASE AND STATED THAT THEY WOULD BE IN TOUCH WITH THEIR DECISION. THE CURRENT AND FAILURE MILEAGES WERE 144,000.
11190477	CHEVROLET	TAHOE	2000	2019-03-17	TL* THE CONTACT OWNS A 2000 CHEVROLET TAHOE. WHILE THE CONTACT'S SON WAS DRIVING 40 MPH, HE CRASHED INTO A VEHICLE THAT RAN A RED LIGHT. THE AIR BAGS DID NOT DEPLOY. THE CONTACT'S SON SUSTAINED CHEST, LOWER BACK, AND NECK PAINS THAT REQUIRED MEDICAL ATTENTION. THE CONTACT'S SON WENT TO THE EMERGENCY ROOM TWO SEPARATE TIMES. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOWED TO A TOW YARD. THE CONTACT WAS WAITING FOR FINALIZED INFORMATION FROM THE INSURANCE COMPANY TO DETERMINE IF THE VEHICLE WAS TOTALED. THE DEALER AND MANUFACTURER WERE NOT CONTACTED. THE CAUSE OF THE FAILURE WAS NOT DETERMINED. THE FAILURE MILEAGE WAS UNKNOWN.
864850	CHEVROLET	TRACKER	2000	2000-06-28	HAD A DIRECT FRONTAL IMPACT, AND DRIVER AND PASSENGER AIRBAG DID NOT DEPLOY WHICH DID NOT PROTECT THE OCCUPANTS IN THE CRASH. NO PRIOR PROBLEMS WITH THE AIRBAG SYSTEM. *AK *ML
870591	CHEVROLET	TRACKER	2000	2000-07-22	DRIVING AT APPROXIMATELY 50 MPH DRIVER SWERVED TO AVOID HITTING ANOTHER VEHICLE AND LOST CONTROL. VEHICLE WENT ACROSS FREEWAY AND HIT A STEEL BARRIER WITH THE RIGHT FRONT PASSENGER'S SIDE, AND CONTINUED ON FOR A BLOCK. THEN, WENT INTO A DITCH, NOSE FIRST UPON IMPACT, DUAL AIRBAGS DID NOT DEPLOY, CAUSING MINOR INJURIES IN STERNUM AND HEAD. NO INDICATION OF AIRBAG BEING DEFECTIVE. VEHICLE WAS A TOTAL LOSS. *AK
883185	CHEVROLET	TRACKER	2000	2001-01-31	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH A 1985 528i, BMW, SPEED WAS NOT DETERMINED, AND BOTH AIR BAGS DID NOT DEPLOY. DEALER / MANUFACTURER WERE NOTIFIED, AND UNWILLING TO ASSIST IN THIS MATTER. FEEL FREE TO PROVIDE ANY FURTHER DETAILS ON THIS MATTER. *AK
891375	CHEVROLET	TRACKER	2000	2001-06-16	WHILE DRIVING AT 45 MPH CONSUMER'S VEHICLE WAS INVOLVED IN A DIRECT FRONTAL COLLISION. UPON IMPACT, NEITHER DRIVER'S SIDE NOR PASSENGER'S SIDE AIR BAGS DEPLOYED. DEALER WILL INSPECT VEHICLE. PLEASE PROVIDE ANY FURTHER DETAILS. *AK
897476	CHEVROLET	TRACKER	2000	2001-09-29	FRONTAL AIRBAGS DID NOT DEPLOY WHEN VEHICLE WAS INVOLVED IN A HEAD-ON ACCIDENT AT 30-35 MPH. CONSUMER COLLIDED WITH ANOTHER VEHICLE WHILE MAKING A TURN. VEHICLE HAD FRONTAL DAMAGE. *AK 8SLC
558644	GMC	YUKON	2000	2000-12-16	THE AIRBAG DID NOT DEPLOY IN A HEAD ON COLLISION RESULTING IN INJURIES. NLM
8009240	GMC	YUKON	2000	2002-05-05	FRONTAL COLLISION AT 40-45 MPH, NEITHER AIRBAG DEPLOYED. DRIVER SUFFERED HEAD INJURY. *AK *YD
10141369	GMC	YUKON	2000	2005-09-23	DT: THE CONTACT STATED THAT WHILE TRAVELING 31 MPH ON A GRAVEL ROAD IN DRY CONDITIONS THE CONTACT LOST CONTROL OF THE VEHICLE AND IT STRUCK A TREE. UPON IMPACT, THE AIRBAGS DID NOT DEPLOY. THE FRONT PASSENGER HAD TO BE EXTRACTED FROM THE VEHICLE. THE DASHBOARD COLLAPSED INTO THE FRONT SEAT ALONG WITH THE FIREWALL. THERE WERE 3 INJURIES, AND A POLICE REPORT WAS TAKEN. THE VEHICLE WAS TOTALED. A GM REPRESENTATIVE RETRIEVED THE BLACK DETECTION BOX, VERIFIED THE SPEED OF 31 MPH, AND DETERMINED THAT THE AIRBAGS SHOULD HAVE DEPLOYED. GM PURCHASED THE SALVAGED VEHICLE FROM THE INSURANCE COMPANY AND DESTROYED IT. *AK
729997	ISUZU	AMIGO	2000	2000-08-29	MY WIFE AND DAUGHTER WERE INVOLVED IN A CRASH WITH OUR 2000 ISUZU AMIGO. MY WIFE IMPACTED A VEHICLE WHICH HAD CRASHED INTO ANOTHER VEHICLE AT APPROXIMATELY 25 MPH. NEITHER AIR BAG DEPLOYED NOR DID THE SEAT BELT TIGHTEN UP TO RESTRAIN MY WIFE, WHICH RESULTED IN HER IMPACTING THE STEERING WHEEL. AT THE SAME TIME, THE DRIVERS SEAT MOVED FORWARD AND DID NOT REMAIN STATIONARY.
10052346	ISUZU	RODEO	2000	2004-01-04	DURING A 40 MPH CRASH INTO A CONCRETE CENTER DIVIDER ON A INTERSTATE IN WHICH THE VEHICLE MADE CONTACT WITH THE FRONT AND DRIVER FRONT AREA, CAUSING EXTENSIVE DAMAGES. INCLUDING PUSHING BUMPER,GRILLE,HEADLIGHTS AND HOOD UP INTO THE ENGINE COMPARTMENT. TO MY SHOCK THE AIRBAGS DID NOT DEPLOY. WHAT IS UP WITH THIS? DO THEY JUST TELL YOU THEY ARE THERE AND THEY DON'T WORK WHEN YOU NEED THEM??? I WILL NOT PURCHASE ANOTHER ISUZU PRODUCT AND AM SEEKING A CLAIM AGAINST ISUZU TO FIND OUT WHAT THE PROBLEM MIGHT BE. THANK YOU FOR YOUR TIME!! *LA
10083770	ISUZU	RODEO	2000	2004-02-26	AIR BAGS ON 2000 ISUZU RODEO ARE DEFECTIVE.*MR THE CONSUMER WAS INVOLVED IN A FRONT END COLLISION YET NONE OF THE AIR BAGS DEPLOYED. THE CONSUMER CONTACTED THE MANUFACTURER ABOUT THE AIR BAGS BUT THE REPRESENTATIVE DID NOT SEEM TO BE TOO CONCERNED ABOUT THE SITUATION. THE CONSUMER BELIEVES THE AIR BAG SHOULD HAVE DEPLOYED AND DOESN'T FEEL SAFE IN THE VEHICLE. *NM

10087550	ISUZU	RODEO	2000	2004-02-26	VEHICLE WAS INVOLVED IN AN ACCIDENT WHILE TRAVELING AT 25 TO 30 MPH BUT THE AIR BAGS DID NOT DEPLOY.*MR THE CONSUMER WAS INVOLVED IN A FRONT END COLLISION YET NONE OF THE AIR BAGS DEPLOYED. THE CONSUMER CONTACTED THE MANUFACTURER ABOUT THE AIR BAGS BUT THE REPRESENTATIVE DID NOT SEEM TO BE TOO CONCERNED ABOUT THE SITUATION. THE CONSUMER BELIEVES THE AIR BAG SHOULD HAVE DEPLOYED AND DOESN'T FEEL SAFE IN THE VEHICLE. THE VEHICLE SUSTAINED \$6881. WORTH OF FRONT END DAMAGE. *NM
10163811	ISUZU	RODEO	2000	2006-07-20	I WAS IN AN ACCIDENT ON JULY 20,2006. A GIRL RAN A RED LIGHT AND I HIT HER IN THE PASSENGER SIDE OF HER CAR HEAD ON WITH MY 2000 ISUZU RODEO. IT WAS A FULL FRONTAL COLLISION FOR ME AND MY CHILDREN. LUCKILY , WE ARE ALWAYS BUCKLED UP BECAUSE NONE OF MY AIRBAGS DEPLOYED AT ALL. THE OTHER CAR WAS GOING ABOUT 60 MPH AND HER AIRBAG DEPLOYED WHEN I HIT HER BUT MINE DID NOT. LUCKILY, MY CHILDREN WERE NOT HURT BADLY BUT UNFORTUNATELY, I SUSTAINED NECK, BACK AND KNEE INJURIES. I WAS AND STILL AM VERY UPSET THAT MY AIRBAGS FAILED. EVEN THE OWNER OF THE BODY SHOP I USE WAS IN SHOCK THAT THEY DID NOT DEPLOY AS THE IMPACT WAS ENOUGH TO SPLIT THE FRAME OF MY RODEO AND TOTAL IT OUT. I WILL NOT BUY ANOTHER ISUZU AND I WILL ALSO NOT RECOMMEND THEM TO MY FAMILY OR FRIENDS IN THE FUTURE. THANK YOU FOR YOUR TIME, I HOPE I CAN HELP ANOTHER FAMILY FROM GETTING INJURED.
745106	ISUZU	TROOPER	2000	2001-05-02	THE ESTIMATES ARE NOT ALL IN YET, SO THE \$27,000 IS A GUESS AT THIS STAGE. MY FRIEND ALSO HAD A TROOPER WHOSE AIRBAGS FAILED AT LEAST ON ONE FRONT END CRASH.*AK
8009110	ISUZU	TROOPER	2000	2002-04-13	WHILE DRIVING 45MPH T-BONED ANOTHER VEHICLE AND AIR BAGS DIDNOT DEPLOY. DRIVER AND 3 PASSENGERS SUSTAINED INJURIES. *AK
10160322	ISUZU	TROOPER	2000	2006-06-10	DT*: THE CONTACT STATED WHILE DRIVING 15 - 20 MPH THROUGH AT INTERSECTION ANOTHER VEHICLE RAN A STOP SIGN AND HIT THE CONTACT'S VEHICLE. THE VEHICLE RAN INTO A TREE SMASHING THE FRONT OF THE VEHICLE. THE FRONTAL AIR BAGS DID NOT DEPLOY. THE AIR BAG LIGHT DID NOT ILLUMINATE PRIOR TO THE INCIDENT. THE CONTACT WAS WEARING A SEATBELT, HOWEVER INJURIES WERE INCURRED. THE CONTACT HAD BRUISING TO THE FACE AND A SPRAINED HIP. A POLICE REPORT WAS FILED AT THE SCENE. THE VEHICLE WAS DEEMED TOTALED BY THE INSURANCE COMPANY.
744466	CHEVROLET	ASTRO	1999	2001-04-23	MY VEHICLE WAS STRUCK HEAD ON BY AN ONCOMING AUTO TRAVELING AT 45 MPH. MY VEHICLE WAS TRAVELING AT 35 MPH. THE IMPACT WAS AT 12:00. MY AIRBAG DID NOT DEPLOY NOR DID THE PASSENGER SIDE AIR BAG. I WAS 3 POINT BELTED AT THE TIME OF THE COLLISION. THE OTHER VEHICLE WAS A CHEVROLET BERRETA 2 DOOR AUTOMOBILE.*AK
757589	CHEVROLET	ASTRO	1999	2001-12-12	WAS IN FRONT IMPACT HEAD-N COLLISION ON 12/12/01. SPEED BETWEEN 40 AND 65 MPH. AIRBAGS FAILED TO DEPLOY.*AK
759758	CHEVROLET	ASTRO	1999	2002-02-19	AIR BAGS DID NOT DEPLOY IN A NEARLY HEAD-ON CRASH AT AN ESTIMATED SPEED OF 60 MPH. RELATIVE SPEED MAY HAVE BEEN LESS, BECAUSE VEHICLE WHICH THIS VAN HIT WAS SLIDING BACKWARDS IN THE SAME DIRECTION OF TRAVEL AS THE VAN. HOWEVER, CLOSING SPEED HAD TO BE SIGNIFICANT TO CAUSE IT TO BE DAMAGED BEYOND REPAIR WITHIN ITS \$13,000 VALUE. VEHICLE WAS A TOTAL LOSS. WE HAVE OWNED THIS VEHICLE SINCE NEW, NO MODIFICATIONS HAVE BEEN MADE TO IT, AND IT HAD NEVER BEEN IN AN ACCIDENT BEFORE THIS. DIGITAL PHOTOS OF DAMAGED VEHICLE ARE AVAILABLE IF DESIRED. *AK
873826	CHEVROLET	ASTRO	1999	2000-10-22	CONSUMER WAS TRAVELING ABOUT 35MPH ON A SIDE STREET AND ANOTHER VEHICLE VEERED INTO HIM BY CROSSING OVER INTO THE MERIDIAN STRIP. UPON IMPACT, NEITHER AIRBAG DEPLOYED, AND MORE THAN ONE PERSON WAS INJURED.*AK
8016641	CHEVROLET	ASTRO	1999	2002-08-05	IN A FRONTAL COLLISION NONE OF THE AIR BAGS DEPLOYED ON IMPACT, CAUSING MAJOR INJURIES TO DRIVER.*AK
10081510	CHEVROLET	ASTRO	1999	2004-06-22	WHILE DRIVING 40 MPH VEHICLE STALLED. THEN, VEHICLE SUDDENLY ACCELERATED. CONSUMER APPLIED THE BRAKES, BUT THEY WERE INOPERATIVE. THIS CAUSED THE VEHICLE TO CRASH INTO A TREE. UPON IMPACT, BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. DRIVER AND TWO PASSENGERS SUSTAINED MAJOR INJURIES, AND WERE TRANSPORTED TO THE HOSPITAL BY AMBULANCE. THE VEHICLE WAS TOWED TO A GARAGE. *AK
10087718	CHEVROLET	ASTRO	1999	2004-08-11	WHILE DRIVING CONSUMER TRIED TO AVOID A PERSON ON A BICYCLE ON THE ROAD. SWERVED IN ORDER NOT TO HIT THE PERSON, BUT WAS UNABLE TO MAINTAIN CONTROL OF THE VEHICLE, JUMPED A CURB, AND COLLIDED WITH A FIRE HYDRANT, AND STRIKING A TREE. UPON IMPACT, BOTH FRONTAL AIR BAGS DID NOT DEPLOY DRIVER SUSTAINED HEAD AND NECK INJURIES, AND WAS TRANSPORTED BY AMBULANCE TO A HOSPITAL. VEHICLE WAS TOWED TO THE DEALER FOR INSPECTION. CONSUMER CONTACTED THE MANUFACTURER AND A REPRESENTATIVE CAME DOWN TO MEET WITH THE DEALER AND CONSUMER. THE REPRESENTATIVE INFORMED CONSUMER THAT THE VEHICLE WAS FUNCTIONING AS DESIGNED,AND THE RATE OF DECELERATION AND IMPACT WAS PRESENT. *AK

10205366	CHEVROLET	ASTRO	1999	2007-01-31	TL*THE CONTACT OWNS A 2000 CHEVROLET ASTRO. WHILE DRIVING 25 MPH THROUGH SNOW AND ICE, THE CONTACT LOST CONTROL OF THE VEHICLE AND SLID OFF THE ROAD. THE VEHICLE THEN STRUCK A TELEPHONE POLE. THE AIR BAGS FAILED TO DEPLOY. THE SEAT BELT FAILED TO RESTRAIN HIM AND HE STRUCK HIS HEAD ON THE WINDSHIELD. THE WOUND TOOK 24 STITCHES TO CLOSE. MOST OF THE VEHICLE WAS REPAIRED AT THE COST OF \$4,500. THE MANUFACTURER'S INVESTIGATOR CONCLUDED THAT THE AIR BAG WOULD NOT DEPLOY AT 25 MPH. THE ARKANSAS POLICE DEPARTMENT FILED REPORT NUMBER 07-00343. THE CURRENT MILEAGE WAS 146,661 AND FAILURE MILEAGE WAS 125,000.
10347238	CHEVROLET	ASTRO	1999	2010-08-03	AIRBAGS FAILED TO DEPLOY IN AN APPROX. 50 MPH HEAD-ON CRASH. *TR
716098	CHEVROLET	BLAZER	1999	1999-12-12	VEHICLE IMPACTED A HORSE IN ROAD AT A SPEED OF 45 MPH. IMPACT WAS HEAD-ON. LEGS OF THE HORSE CONTACTED THE FRONT BUMPER PROPELLING THE HORSE INTO THE WINDSHIELD AND ONTO THE ROOF.THE CAR SUSTAINED MAJOR DAMAGE TO THE FRONT. ALTHOUGH THERE WAS SIGNIFICANT DENTING OF THE BUMPER THE AIR BAGS FAILED TO DEPLOY. THE ROOF OVER THE FRONT PASSENGER HAD MAJOR CRUSHING INCLUDING THE DRIVER'S FRONT PILLA. *AK
767338	CHEVROLET	BLAZER	1999	2002-09-15	FRONT OF CAR BUMPER AND ENGINE PUSHED IN 6-8 INCHES. WENT UP HILL HIT TREE OVER TURNED 2 TIMES. UPON IMPACT, AIR BAGS FAILED TO DEPLOY. *AK
859664	CHEVROLET	BLAZER	1999	2000-04-04	CONSUMER WAS TRAVELING ABOUT 42MPH IN GOOD WEATHER CONDITIONS, AND WAS HIT BY ANOTHER VEHICLE ON THE DRIVER'S SIDE DOOR AND THE FRONT HOOD. UPON IMPACT, AIRBAGS DIDN'T DEPLOY. DEALER WILL BE CONTACTED. *AK
874736	CHEVROLET	BLAZER	1999	2000-10-20	CONSUMER WAS TRAVELING 32MPH & HAD A HEAD-ON COLLISION. CONSUMER WAS WEARING SEAT BELT RESTRAINT AT THE TIME, BUT FRONTAL AIR BAGS DIDN'T DEPLOY. DEALER CLOSED THE CASE AT ONE POINT & REOPENED IT ONCE. CONSUMER CONTACTED THEM A SECOND TIME.*AK *SLC
8004945	CHEVROLET	BLAZER	1999	2002-02-28	WHILE TRAVELING ON INTERSTATE AND WITHOUT PRIOR WARNING A DEER JUMPED IN FRONT OF VEHICLE. DRIVER'S SIDE SEATBELT DIDN'T HOLD, AND AIRBAGS DIDN'T DEPLOY.*AK
8020401	CHEVROLET	BLAZER	1999		THE TRUCK WENT INTO A SKID ON WET ROAD AFTER ATTEMPTING A REAR END COLLISION THAT OCCURED IN FRONT OF THEM. THE TRUCK DID AVOID COLLIDING WITH THEM BUT SPUN AROUND HITTING CONCRETE WALL. NEITHER AIR BAGS DEPLOYED UP IMPACT WITH ESTIMATED SPEED OF 65 MPH. PLEASE DESCRIBE DETAILS. MR
8021177	CHEVROLET	BLAZER	1999		WAS DRIVING, WHEN ANOTHER VEHICLE REAR ENDED VEHICLE IN FRONT OF IT. BLAZER AVOID HITTING VEHICLE ON WET ROAD & SPUN AROUND AFTER APPLYING BRAKES. VEHICLE HIT MEDIAN WALL WITH FRONT OF VEHICLE. UPON IMPACT, THE AIR BAGS FAILED TO DEPLOY. MR
10017194	CHEVROLET	BLAZER	1999	2003-04-18	THE VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH A DEER WHILE DRIVING 60 MPH AND NONE OF THE NEITHER AIR BAGS DEPLOYED. THE DEALER WAS NOTIFIED. *NLM
10021489	CHEVROLET	BLAZER	1999	2003-06-10	INVOLVED IN HEAD ON COLLISION, BOTH GOING APPROXIMATELY 30 MPH, NEITHER FRONT AIR BAG DEPLOYED. SEVERE FACIAL INJURIES FOR ONE AND CONCUSSION FOR PASSENGER RESULTED. *JB
10049340	CHEVROLET	BLAZER	1999	2003-12-06	THE AIRBAGS DID NOT DEPLOY. THIS CAUSED INJURY TO THE DRIVER CHEST. THIS SHOULD NEED TO BE FIXED ASAP BY GM. I WILL NEVER PURCHASE A CHEVY AGAIN. AIRBAGS THAT DO NOT DEPLOY WHEN YOU HIT HEAD ON AND ROLL SHOULD NOT BE ALLOWED. *LA
10050546	CHEVROLET	BLAZER	1999	2003-12-15	WHILE DRIVING ON ICY ROAD AT 50 TO 55 MPH DRIVER LOST CONTROL OF VEHICLE. IT WENT AIRBORNE AND LANDED IN A DITCH . UPON IMPACT,NONE OF THE AIR BAGS DEPLOYED. *AK
10063865	CHEVROLET	BLAZER	1999	1999-03-23	THE AIRBAGS NEVER WENT OFF IN A FRONT END COLLISION.
10087245	CHEVROLET	BLAZER	1999	2004-06-09	WHILE DRIVING 35 MPH,ANOTHER VEHICLE HIT CONSUMER'S VEHICLE ON THE PASSENGER SIDE. THIS CAUSED THE VEHICLE TO SPIN AROUND AND SLAM INTO ANOTHER VEHICLE HEAD ON. UPON IMPACT, BOTH FRONTAL AIR BAGS DID NOT DEPLOY, NOR DID THE DRIVERS SEAT BELT LOCK. CONSUMER HAD THE VEHICLE TOWED TO THE DEALERSHIP FOR INSPECTION. *AK
10099164	CHEVROLET	BLAZER	1999	2004-10-21	WHILE DRIVING 45 MPH, THE VEHICLE COLLIDED WITH THE VEHICLE IN FRONT OF HERS. THE AIR BAGS FAILED TO DEPLOY. THIS CAUSED THE DRIVER TO SUSTAINED MAJOR INJURIES AND WAS TRANSPORTED TO THE HOSPITAL. THE VEHICLE WAS TOWED TO A GARAGE FOR INSPECTION. THE CAUSE HAS NOT BEEN DETERMINED AT THIS TIME. PLEASE PROVIDE FURTHER DETAILS. *JB
10161658	CHEVROLET	BLAZER	1999	2006-06-03	DT*: THE CONTACT STATED THE VEHICLE IMPACTED A TREE, HEAD ON. THE FRONTAL AIRBAGS FAILED TO DEPLOY, RESULTING IN INJURIES OF THE CONTACT'S LEFT KNEE, ELBOW AND HEAD. A POLICE REPORT WAS FILED AND PICTURES WERE TAKEN AFTER THE VEHICLE WAS MOVED TO THE JUNKYARD. NO REPAIRS WERE MADE BECAUSE THE VEHICLE WAS DETERMINED BY THE INSURER TO BE TOTALED. THE MANUFACTURER WAS CONTACTED. 08/04/06 CHEVY DRIVER HIT A CAR IN HER LANE FIRST, THEN RICOCHETED HEAD ON INTO A TREE. NEITHER TIME DID AIRBAGS DEPLOY. *TT
10223949	CHEVROLET	BLAZER	1999	2008-02-09	1999 CHEVY BLAZER AIRBAGS FAILED TO DEPLOY IN AN ACCIDENT. CONSUMER STATES THAT THE AIRBAGS DID NOT DEPLOY. CONSUMER WAS INJURED AND VEHICLE WAS TOTALED. CONSUMER MIGHT NOT HAVE THOSE INJURIES IF THE AIRBAGS WORKED PROPERLY. *KB
548902	CHEVROLET	SILVERADO	1999	1999-08-13	NO DEPLOYMENT OF DRIVER AND PASSENGER SIDE AIR BAGS DURING COLLISION WITH FIXED OBJECT (TREE) CAUSED INJURY TO DRIVE. NLM

709384	CHEVROLET	SILVERADO	1999	1999-07-20	THE 1999 CHEVROLET TRUCK EX SILV ANTILOCK BREAKS HAVE BEEN FAILING AT RANDOM TIMES SINCE APRIL 1 1999. FIRST AT SLOW SPEEDS AND THEN AT HIGH SPEEDS RANDOMLY. ON 720-1999 MY SPEED WAS 60 MI HR AND THE BRAKES FAILED WHEN A DEER CROSSED THE STATE HIGHWAY BETWEEN GRAHAM TX AND BRECKENRIDGE TX. THE BRAKES DELAYED AND I HIT THE DEER DEAD CENTER OF MY BUMPER AND GRILL! THE AIR BAGS DIDNOT INFLATE EVER!
741598	CHEVROLET	SILVERADO	1999	2000-01-13	MY AIR BAG DID NOT ACTIVATE AND IN A DIRECT FRONT END COLLISION. THE SUN SETTING BLINDED ME AND I HIT DIRECTLY THE REAR OF THE CAR IN FRONT OF ME AND IT'S AIRBAG DEPLOYED AND THE CHAIN REACTION OF THE TWO CARS IN FRONT OF THE CAR I HIT AIRBAGS DEPLOYED. GM SAID MY AIRBAG WAS NOT DEFECTIVE AND I ASKED TO HAVE IT CHECKED TWO TIMES. IT SHOULD HAVE DEPLOYED AND IT DID NOT. I WAS NOT WEARING A SEAT BELT AND I SUFFERED HEAD INJURIES. I SOLD TRUCK BECAUSE I DID NOT WANT TO DIE NEXT FAILURE.
746679	CHEVROLET	SILVERADO	1999	2001-04-30	DRIVER HIT A STOPPED VEHICLE ON THE INTERSTATE AT APPROXIMATELY 60 MPH. OCCUPANT OF STALLED VEHICLE WAS KILLED AND OUR AIRBAGS DID NOT DEPLOY. WE FELT THAT IT SHOULD HAVE DEPLOYED AND GMC IS ARGUING THAT IT SHOULD NOT HAVE. ANY INFORMATION ABOUT AIRBAGS WOULD BE APPRECIATED. *AK
762651	CHEVROLET	SILVERADO	1999	2002-05-21	DRIVER & PASSENGER AIR BAGS DIDN'T DEPLOY IN A 65 MPH COMBINED SPEED , HEAD ON CRASH. *AK
842094	CHEVROLET	SILVERADO	1999		VEHICLE WAS INVOLVED IN A FULL FRONTAL COLLISION AT 40 MPH, AND NEITHER DRIVER'S SIDE NOR PASSENGER'S SIDE AIRBAGS DEPLOYED. CHEVROLET AND DEALER REFUSED TO GIVE ANY EXPLANATION WHY AIR BAGS DID NOT DEPLOY. *AK
844072	CHEVROLET	SILVERADO	1999	1999-07-21	WHILE DRIVING 40 MPH , LOST CONTROL. VEHICLE WENT INTO A DITCH. UPON IMPACT, DRIVER'S AND PASSENGER'S AIRBAGS DID NOT DEPLOY WHICH DID NOT PROTECT THE OCCUPANT IN THIS CRASH. PLEASE PROVIDE FURTHER INFORMATION AND VIN#. *AK
851420	CHEVROLET	SILVERADO	1999	1999-08-13	CONSUMER WAS DRIVING AND A DEER JUMPED IN FRONT OF HIS VEHICLE. CONSUMER SWERVED TO THE RIGHT AND HE WENT INTO A TREE. AIRBAGS DIDN'T DEPLOY AT ALL, CONSUMER SUSTAINED HEAD INJURIES. *AK
854784	CHEVROLET	SILVERADO	1999	1999-10-08	WHILE DRIVING 60 MPH HAD A FRONTAL IMPACT, AND DRIVER'S AND PASSENGER'S AIR BAGS DID NOT DEPLOY WHICH DID NOT PROTECT THE OCCUPANT IN THIS CRASH. *AK *ML
858532	CHEVROLET	SILVERADO	1999	2000-03-01	CONSUMER'S DAUGHTER WAS IN A CAR CRASH. PASSENGER'S SEAT BELT DIDN'T HOLD. THE PASSENGER AND DRIVER WERE EJECTED FROM THE VEHICLE. ALSO, AIRBAGS DIDN'T DEPLOY. *AK
858811	CHEVROLET	SILVERADO	1999	2000-02-18	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT 35 MPH. VEHICLE WAS TOTALLED, AND THE AIRBAGS DID NOT DEPLOY, RESULTING IN MINOR INJURIES. MANUFACTURER HAS INSPECTED THE VEHICLE, AND CLAIMS THAT THE AIR BAGS WERE NOT SUPPOSED TO DEPLOY IN THIS SORT OF ACCIDENT. *AK
859858	CHEVROLET	SILVERADO	1999	1999-04-03	WHILE TRAVELING ON A WET ROAD AT HIGHWAY SPEED OF 60 MPH VEHICLE HYDROPLANED, SPUN INTO A DITCH, AND COLLIDED INTO A TREE WITH BOTH SIDES AND FRONT OF VEHICLE. UPON IMPACT, AIR BAGS FAILED TO DEPLOY. MFR. NOTIFIED. *AK
866622	CHEVROLET	SILVERADO	1999	2000-07-27	CONSUMER WAS TRAVELING ABOUT 65 ON THE INTERSTATE AND FELL A SLEEP. HE HIT AN ENBANKMENT, AND AIRBAGS DIDN'T GO OFF, THERE WERE 2 INJURIES. *AK
871182	CHEVROLET	SILVERADO	1999	2000-04-29	WHILE DRIVING ABOUT 50 MPH AND WHEN EXITING A FREEWAY RAM STEPPED ON BRAKE PEDAL, BUT VEHICLE DID NOT STOP AND LOST CONTRO/ SPAN AND STRUCK A ROAD SIGN FRONT FIRST. UPON IMPACT, NONE OF THE AIR BAGS DEPLOYED.*AK
875702	CHEVROLET	SILVERADO	1999	2000-11-08	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT 55-60MPH. UPON IMPACT, AIRBAGS DID NOT DEPLOY, RESULTING IN MINOR INJURIES. VEHICLE WAS TOTALLED. *AK
877481	CHEVROLET	SILVERADO	1999	2000-12-16	FRONT CRASH AT 50 MPH, VEHICLE TOTALLED, DRIVER INJURED WHEN SHE HIT STEERING WHEEL, AND AIRBAG DID NOT DEPLOY. *AK
886863	CHEVROLET	SILVERADO	1999	2001-04-21	WHILE DRIVING 70 MPH CONSUMER HAD A FRONT CRASH . BUMPER BROKE IN TWO, AND FRONT END WAS PUSHED BACK ABOUT 4-6 INCHES. VEHICLE HIT A TREE. UPON IMPACT, AIRBAGS DID NOT DEPLOY. *AK
891163	CHEVROLET	SILVERADO	1999	2001-06-23	WHILE TRAVELING 35-40 MPH ON A BRIDGE WITHOUT PRIOR WARNING BACKEND OF VEHICLE BEGAN TO FISHTAIL ,CAUSING VEHICLE TO LOSE CONTROL. CONSUMER RELEASED FOOT FROM GAS TO CORRECT VEHICLE STEERING. VEHICLE WAS UNRESPONSIVE, RESULTING IN A FRONTAL COLLISION WITH A JERSEY WALL. UPON IMPACT, PASSENGER AIRBAGS FAILED TO DEPLOY, ENGINE WAS PUSHED SIX INCHES UNDER THE DASH. CONSUMER HAS YET TO CONTACT DEALER. *AK DRIVER WAS INJURED IN ACCIDENT. *SLC
10026451	CHEVROLET	SILVERADO	1999	2003-05-06	1999 CHEVROLET SILVERADO FAULTY DRIVER RESTRAINT SYSTEM. *MR THE VEHICLE WAS INVOLVED IN AN ACCIDENT. THE SAFETY BELT FAILED TO THE RESTRAIN THE DRIVER, AND THE AIR BAG DID NOT DEPLOY. *TS. THE DRIVER RECEIVED SERIOUS HEAD INJURIES. (LAWYER JOHN KELLY ON BEHALF OF CLIENT, JAMES SCOTT). *JB
10113304	CHEVROLET	SILVERADO	1999	2005-02-03	WHILE DRIVING APPROXIMATELY 20 MPH DRIVER LOST CONTROL OF THE VEHICLE AND IT CRASHED INTO A BRICK WALL. UPON IMPACT, BOTH FRONTAL AIR BAGS FAILED TO DEPLOY. DRIVER SUSTAINED MAJOR INJURIES, AND WAS TRANSPORTED TO THE HOSPITAL BY A HELICOPTER. THE VEHICLE WAS TOWED TO A GARAGE FOR INSPECTION. *AK

10144603	CHEVROLET	SILVERADO	1999	2005-11-01	DT: THE CONTACT STATED WHILE TRAVELING AT 65 MPH HE FELL ASLEEP AT THE WHEEL. THE VEHICLE WAS INVOLVED IN A CRASH, IT HIT A GUARD RAIL. THIS WAS A FRONTAL IMPACT, AND THE DRIVER'S SIDE AIR BAG DID NOT DEPLOY. THE VEHICLE WAS TOTALED.
731578	CHEVROLET	SUBURBAN	1999	2000-01-15	AIRBAGS FAILED TO DEPLOY ON FRONTAL INTERSTATE SPEED IMPACT. DEALER DISCLAIMED SERIOUSNESS. DOOR LOCKS WOULD LOCK AUTOMATICALLY, WITHOUT ANY ADULT IN THE CAR... HOWEVER, THERE WERE CHILDREN IN CAR SEATS IN BACK. KEEP SPARE SET OF KEYS IN HAND AT ALL TIMES.
753287	CHEVROLET	SUBURBAN	1999	2001-10-08	60 MPH CROSS WIND BLEW THE SUBURBAN HEAD ON INTO THE CONCRETE MEDIAN. THE VEHICLE SPUN 360 DEGREES, WENT INTO THE DITCH, THE FRONT END HIT AGAIN THE VEHICLE WENT UP THE OTHER SIDE OF THE EMBANKMENT AND STOPPED IN A FIELD. ENTIRE FRONT END OF THE FRAME NOT REPAIRABLE, THE REAR PORTION OF THE FRAME BENT INTO A DIAMOND SHAPE. FRONT CROSSMEMBER BENT AND ENGINE MOVED UPWARDS AT A 10 DEGREE ANGLE. AIR BAGS FAILED TO DEPLOY. *AK
829803	CHEVROLET	SUBURBAN	1999	1998-10-09	CONSUMER WAS TRAVELING ABOUT 30-35 MPH AND ACCIDENTLY REAR ENDED ANOTHER VEHICLE, AIR BAGS DID NOT DEPLOY, CAUSING NECK INJURY/SHOULDER INJURY AND BACK INJURY. *AK
876094	CHEVROLET	SUBURBAN	1999	2000-12-01	CONSUMER WAS TRAVELING ABOUT 45 MPH ON HIGHWAY AND WAS STRUCK HEAD-ON BY ANOTHER VEHICLE WHO ENTERED FREEWAY THROUGH EXIT. UPON IMPACT, FRONT DUAL AIRBAGS DIDN'T DEPLOY. CONSUMER WAS INJURED. *AK
877320	CHEVROLET	SUBURBAN	1999	2000-12-01	CONSUMER WAS TRAVELING ABOUT 40MPH ON HIGHWAY AND ANOTHER VEHICLE VEERED INTO HER LANE, HITTING HER HEAD-ON, AND PUSHING VEHICLE INTO ANOTHER LANE. VEHICLE HIT TELEPHONE POLE, AND DUAL AIRBAGS DIDN'T DEPLOY. CONSUMER WAS INJURED. CHEVROLET HAS BEEN NOTIFIED. *AK
896346	CHEVROLET	SUBURBAN	1999	2001-09-04	WHILE DRIVING 30-35 MPH VEHICLE HIT A FIRE HYDRANT, THEN A TREE. NEITHER AIRBAG DEPLOYED, NO INJURIES. DAMAGE TO VEHICLE UNKNOWN AT THIS TIME. IMPACT WAS MIDDLE OF FRONT OF VEHICLE. *AK
8001742	CHEVROLET	SUBURBAN	1999	2001-12-28	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT 20MPH. UPON IMPACT, AIR BAGS DID NOT DEPLOY. DEALER HAS BEEN NOTIFIED. PLEASE PROVIDE ADDITIONAL INFORMATION.*AK
10029300	CHEVROLET	SUBURBAN	1999	2003-05-08	THIS COMPLAINT IS IN REGARDS TO MY RECENT MOTOR VEHICLE ACCIDENT ON MAY 8, 2003. THE OTHER DRIVER FAILED TO YIELD MY RIGHT AWAY. I WAS DRIVING A 1999 CHEVROLET SRUBURBAN. I SERVED INTO ONCOMING TRAFFIC, INTO A RESIDENCE YARD, STRIKING A TREE HEAD ON AT APPROXIMATELY 35 MILES PER HOUR. I HAVE CORRESPONDED WITH GMC VIA E-MAIL UNTO NOT MY SATISFACTION. I REQUESTED MY VEHICLE HAVE A DIAGNOSTIC EVALUATION CONDUCTED, AS I WANTED TO KNOW WHY THE AIR BAGS DID NOT DEPLOY. I HAVE BASICALLY BEEN TOLD BY GMC THAT IF THE AIRBAG LIGHT IS FUNCTIONING IN THE DASHBOARD OF MY TRUCK THEN THERE IS NOTHING WRONG WITH MY AIR BAGS PER A CUSTOMER RELATIONSHIP MANAGER AND THAT MY ACCIDENT DID NOT, MEET THE CRITERIA FOR AIR BAG DEPLOYMENT. I HIGHLY DISAGREE WITH GMC'S EXPLANATION AND CRITICIZE THE LACK OF PROFESSIONAL DIPLOMACY AND CONCERN. I WOULD HAVE EXPECTED MORE FROM ONE OF THE BIG 3 AUTO CORPORATIONS. MY VEHICLE STRUCK A TREE WITH ENOUGH FORCE TO BEND THE FRONT LEFT FRAME RAIL. THE IMPACT ALSO WAS GREAT ENOUGH TO RAISE THE REAR OF THE VEHICLE OF THE GROUND AND SET IT DOWN A FOOT TO THE LEFT OF THE INITIAL IMPACT. THIS HAS ALSO LEFT ME WITH DOCUMENTED INJURIES CAUSING ME TO BE UNABLE TO WORK. MY CONFIDENCE IN THIS VEHICLE'S AIR BAG SYSTEM HAS DIMINISHED TO SAY THE LEAST. THIS MATTER HAS NOT BEEN HANDLED NOR COMPLETED TO MY SATISFACTION. I EXPECTED AT LEAST AN OFFERING TO HAVE THE VEHICLE TAKEN TO A LOCAL DEALERSHIP TO HAVE A DIAGNOSTIC EVALUATION CONDUCTED. THIS WOULD ALLOW ME TO DRIVE THE VEHICLE WITH SOME CONFIDENCE THAT THE SYSTEM WOULD WORK IN THE EVENT I NEED IT AGAIN. I AM AT A STAND STILL AND I AM POSITIVE I AM NOT THE ONLY PERSON WHO HAS HAD THIS PROBLEM IN THE PAST. I WOULD LIKE MORE INFORMATION RELATED TO FAILED AIR BAG DEPLOYMENT AND GMC CHEVY SUBURBAN. I HAVE ALSO SEEN A RECALL ON THE INTERNET WHICH MY VEHICLE FALLS UNDER RELATED TO AIRBAGS. THANK YOU FOR YOUR TIME AND CONSIDERATION.*AK
10194121	CHEVROLET	SUBURBAN	1999	2007-06-24	TL*THE CONTACT OWNS A 1999 CHEVROLET SUBURBAN. WHILE DRIVING 55 MPH, THE CONTACT CRASHED INTO THE FRONT END OF ANOTHER VEHICLE. THE AIR BAGS FAILED TO DEPLOY. THE CONTACT WAS SEATED IN THE PASSENGER SEAT AND SUFFERED A CONTUSION ON HER LEFT LEG AND BRUISES ON HER RIGHT LEG. THE DEALER HAS NOT INSPECTED THE VEHICLE TO DETERMINE THE CAUSE OF FAILURE. THE VEHICLE WAS DESTROYED. THE CURRENT AND FAILURE MILEAGES WERE 115,000.
10287421	CHEVROLET	SUBURBAN	1999	2009-09-25	DEER ACCIDENT, LOST CONTROL RAN HEAD ON INTO THE CURB, HIT A SIGN. FRAME IS BENT, WINDSHIELD IS SHATTERED AND CAVED IN, FRONT PUSH GUARD IS BENT, AND FRONT PASSENGER FENDER WELL IS CAVED IN. AIRBAGS DID NOT DEPLOY!!! *TR

10372658	CHEVROLET	SUBURBAN	1999	2010-12-21	TL* THE CONTACT OWNS A 1999 CHEVROLET SUBURBAN. THE CONTACT STATED THAT WHILE DRIVING APPROXIMATELY 40 MPH, HE CRASHED INTO THE PASSENGER SIDE OF ANOTHER VEHICLE. THE AIR BAGS DID NOT DEPLOY. THE CONTACT AND ANOTHER PASSENGER SUSTAINED MINOR ABRASIONS AND INJURIES TO THE NECK AND BACK. THE DRIVER OF THE SECOND VEHICLE WAS INJURED BUT THE EXTENT OF THE INJURIES WAS UNKNOWN. A POLICE REPORT WAS AVAILABLE. THE VEHICLE WAS TOWED TO AN INDEPENDENT MECHANIC WHERE THE CONTACT WAS INFORMED THAT THE VEHICLE WAS DEEMED AS DESTROYED. THE FAILURE MILEAGE WAS APPROXIMATELY 133,000. UPDATED 03/03/11
704617	CHEVROLET	TAHOE	1999	1999-03-04	THE VEHICLE WAS TRAVELING APPROX 40 MPH WHEN IT HIT BLACK ICE AND SLID OFF THE ROAD AND HIT A BIG ROCK ON THE PASSENGER SIDE FRONT. THE PASSENGER SIDE FRONT BODY AND AXLE WAS PUSHED BACK APPROX 6 TO 8". NEITHER AIR BAG OPENED PASSENGER OR DRIVER. THE PASSENGER MY WIFE SUFFERED A BROKEN BACK. THE VEHICLE WAS TOTALED BY THE INSURANCE. ONE REASON WE BOUGHT THE CHEVROLET TAHOE WAS BECAUSE OF THE DUEL AIR BAG. I FEEL THAT THE SEVERITY OF THE ACCIDENT THE AIR BAGS SHOULD HAVE OPENED. I HAVE TAKEN PICTURES AND STATE FARM INSURANCE IS ALSO INVESTIGATING THE ACCIDENT FOR THE FAILED AIR BAGS.
757392	CHEVROLET	TAHOE	1999	2002-01-22	DRIVERS AIRBAG FAILED TO DEPLOY IN A FRONT END ACCIDENT. *AK
761485	CHEVROLET	TAHOE	1999	2002-04-19	THIS WAS A VERY HEAVY FRONT END COLLISION. THE VISUAL DAMAGE EST. IS 10,000 DOLLARS AND STILL RISING THEY DO NOT HAVE THE INTERNAL DAMAGE EST. I CALLED GM AND FILED A FORMAL COMPLAINT. THEY TOLD ME THAT THEY WERE VERY BUSY AND DID NOT HAVE TIME TO INVESTIGATE THIS FAILURE. THEY ALSO TOLD ME THAT THIS WOULD COST THE TOO MUCH MONEY TO DO AN INVESTIGATION. THE REP FROM GM TOLD ME THAT THEY COULD TELL IF THE WRECK WAS BAD ENOUGH BY THE DESCRIPTION OF THE WRECK OVER THE PHONE WITH OUT EVEN SEEING THE WRECK. THE DALLAS FIRE DEPARTMENT, DALLAS POLICE DEPARTMENT, TOW TRUCK DRIVER AND HUFFINES CHEVROLET WHICH IS A CERTIFIED CHEVROLET BODY SHOP SAID THAT THIS WAS WAY TO MUCH DAMAGE TO THE FRONT END AND THEY SHOULD HAVE WENT OFF. BUT COPORATE GM SAID THAT IT WAS NOT AND THEY COULD TELL THAT WITHOUT SEEING THE VEHICLE. GM ALSO TOLD ME THAT THE OTHER VEHICLE IN THE ACCIDENT TOOK ALL THE IMPACT, WITHOUT EVEN SEEING THE VEHICLES HOW WOULD THEY NOW THIS? I STILL HAVE 10,000 DOLLARS OF FRONT END DAMAGE TO MY VEHICLE AND THAT IS WAY TO MUCH IF THE OTHER VEHICLE TOOK ALL THE IMPACT. THEY REPEATEDLY TOLD ME THAT IT WAS OK THAT THEY DID NOT GO OFF BECAUSE THE REST OF THE SAFETY EQUIPMENT WORKED "I.E. SEATBELTS, CRUMPLE ZONES" BUT THAT DOES NOT CHANGE THE FACT THAT THE AIRBAG SYSTEM DID NOT WORK AND THIS WOULD HAVE KEPT MY 7 MONTH PREGNANT WIFE FROM HITTING THE DASH BOARD! IF YOU HAVE ANY QUESTION I WILL BE MORE THAN HAPPY TO ANSWER THEM LARGE OR SMALL. THANK YOU!*AK
860103	CHEVROLET	TAHOE	1999	2000-04-08	WHILE DRIVING DOWN THE ROAD AT 40 MPH ANOTHER VEHICLE RAN A STOP SIGN, CONSUMER HIT OTHER VEHICLE DIRECTLY IN THE SIDE OF CAR. UPON IMPACT, AIR BAGS DID NOT DEPLOY. CONSUMER FELT AIR BAGS SHOULD HAVE DEPLOYED. *AK
863306	CHEVROLET	TAHOE	1999		WHILE TRAVELING AT 45 MPH ANOTHER VEHICLE PULLED OUT IN FRONT OF CONSUMER'S VEHICLE RESULTING IN AN ACCIDENT. UPON IMPACT, AIR BAGS DID NOT DEPLOY AT ANY TIME. ALSO, ABS LOCKED UP. PLEASE PROVIDE FURTHER INFORMATION. *AK
878233	CHEVROLET	TAHOE	1999	2000-12-29	CONSUMER WAS TRAVELING 55MPH ON HIGHWAY AND ANOTHER VEHICLE RAN IN FRONT, AND CONSUMER'S VEHICLE HIT OTHER VEHICLE BROADSIDE. UPON IMPACT, AIRBAGS DIDN'T GO OFF.*AK
887011	CHEVROLET	TAHOE	1999	2001-04-13	CONSUMER WAS TRAVELING ABOUT 30MPH ON HIGHWAY AND WITHOUT PRIOR WARNING FRONT WNT INTO SHOULDERS OF A STEEP HILL. 45 DEGREE ANGLE, AND VEHICLE HIT A TREE. UPON IMPACT, DUAL BAGS DIDN'T GO OFF. DEALERSHIP WAS AWARE OF PROBLEM.*AK
887171	CHEVROLET	TAHOE	1999	2000-12-27	VEHICLE HIT A TREE. UPON IMPACT, SEAT BELT DID NOT RETRACT, AND AIR BAGS DID NOT DEPLOY, RESULTING IN INJURIES.*AK
8006232	CHEVROLET	TAHOE	1999	2002-03-13	FRONT COLLISION AT 25-30 MPH, AND NEITHER AIRBAG DEPLOYED, CONSUMER SUFFERED MINOR INJURIES.*AK
10040265	CHEVROLET	TAHOE	1999	2003-09-09	WHILE DRIVING 40 MPH VEHICLE WAS HIT IN THE FRONT CENTER. BOTH FRONTAL AIR BAGS DID NOT DEPLOY. *AK
10074130	CHEVROLET	TAHOE	1999	2004-04-27	DURING A FRONT END COLLISION WHILE DRIVING AT 55 MPH FRONT AIR BAGS DID NOT DEPLOY. THREE PASSENGERS SUSTAINED MINOR INJURIES. CONSUMER HAD THE VEHICLE TOWED TO DEALERSHIP FOR INSPECTION. *AK
10110864	CHEVROLET	TAHOE	1999	2004-11-15	THE VEHICLE'S AIR BAGS DID NOT DEPLOY DURING A FRONTAL COLLISION. *NM COUNCIL FOR THE CONSUMER STATED THAT AIR BAGS NEED TO BE TESTED AT CHEVROLET'S EXPENSE. *TC *JB
10265716	CHEVROLET	TAHOE	1999	2009-02-15	WHILE DRIVING MY 99 TAHOE DOWN A 4 LANE ROAD, A DRUNK HAD PULLED OUT INFRONT OF ME. I HAD SLAMMED ON MY BRAKES AND SWERVED TO AVOID HIM BUT STILL HIT HIM PRETTY HARD IN HIS REAR QUARTER PANEL. AS A RESULT OF THE ACCIDENT, I HAD SUFFERED A DOUBLE HEMATOMA TO MY BRAIN AND HAD BRAIN SURGERY TO STAY ALIVE. MY COMPLAINT WITH MY TAHOE IS 1) MY AIRBAG IN MY STEERING WHEEL DID NOT DEPLOY. I THINK IF IT DID, MY INJURY WOULD HAVE BEEN AVOIDED. 2) I QUESTION THE STOPPING ABILITY IF MY ANTI DIVE FRONT BRAKES. I WAS ON THE BRAKES HARD WITH THE VEHICLE NOSING DOWN BUT I THINK MY STOPPING DISTANCE SHOULD HAVE BEEN SHORTER. *TR

10299900	CHEVROLET	TAHOE	1999	2010-01-10	TL*THE CONTACT OWNS A 1999 CHEVROLET TAHOE. THE CONTACT WAS DRIVING APPROXIMATELY 15 TO 20 MPH ON NORMAL ROAD CONDITIONS AND UNEXPECTEDLY, THE OPPOSING VEHICLE CRASHED INTO THE FRONT END OF THE VEHICLE WHICH RESULTED IN A HEAD ON COLLISION. THE POLICE AND AMBULANCE WERE CALLED TO THE SCENE. THE CONTACT SUSTAINED SEVERE INJURIES. THE AIR BAG FAILED TO DEPLOY WITH THE MASSIVE LEVEL OF IMPACT. THE VEHICLE WAS COMPLETELY DESTROYED. THE VEHICLE WAS TOWED TO A COLLISION CENTER. THE CONTACT HAD CONCERN OF THE SAFETY RISK INVOLVED. THE FAILURE MILEAGE WAS 141,000.
10350098	CHEVROLET	TAHOE	1999	2009-02-17	I HAVE A 99 TAHOE THAT I WAS INVOLVED IN AN ACCIDENT. I HIT A CAR WHILE DOING 40MPH THAT HAD PULLED OUT INFRONT OF ME. MY AIR BAGS DIDN'T DEPLOY AND MY SAFETY BELT DIDN'T KEEP ME FROM HITTING THE STEERING WHEEL HARD. UPON REVIEW OF MY SAFETY BELT, I NOTICED THAT IT IS ROUTED INCORRECTLY AT THE TOP HOLDER. IT BINDS ON ITSELF PREVENTING IT FROM RETRACTING. MY PASSENGER SIDE IS ROUTED CORRECTLY AND WORKS PERFECTLY. I SUFFERED A BRAIN INJURY BECAUSE OF THIS AND AM QUITE CONCERNED. *TR
11203728	CHEVROLET	TAHOE	1999	2019-04-20	TL* THE CONTACT OWNED A 1999 CHEVROLET TAHOE. WHILE DRIVING 35 MPH, THE CONTACT HAD A HEAD ON COLLISION WITH A LIGHT POLE. THE AIR BAGS DID NOT DEPLOY. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE CONTACT WAS INURED AND RECEIVED MEDICAL ATTENTION. A POLICE REPORT WAS FILED. THE VEHICLE WAS TOTALED AND TOWED TO THE CONTACT'S RESIDENCE. AN UNKNOWN DEALER WAS MADE AWARE OF THE FAILURE, BUT DID NOT ASSIST. THE VEHICLE WAS NOT DIAGNOSED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS UNKNOWN.
859422	CHEVROLET	TRACKER	1999	2000-03-28	VEHICLE REAR ENDED ANOTHER VEHICLE AT 25 MPH. UPON IMPACT, BOTH AIR BAGS FAILED TO DEPLOY. DEALER /MANUFACTURER WERE NOT CONTACTED AT THIS TIME. *AK
865216	CHEVROLET	TRACKER	1999	2000-06-27	CONSUMER'S WIFE WAS TRAVELING ABOUT 35MPH ON THE HIGHWAYAND ANOTHER VEHICLE DIDN'T YIELD AND VEERED INTO HER VEHICLE, AND FORCE HER OFF THE ROAD. THEN SHE WENT INTO A UTILITY POLE. UPON IMPACT, AIR BAGS DID NOT DEPLOY. *AK ALSO HORN IS DIFFICULT TO LOCATE ON THE STEERING WHEEL. *YH
868967	CHEVROLET	TRACKER	1999	2000-08-25	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION WITH A DOGE RAM PICK UP AT A IMPACT OF 30-35 MPH, AND AIR BAGS DIDNOT DEPOLY. DEALER NOTIFIED. FEEL FREE TO PROVIDE ANY FURTHER DETAILS. *AK
899309	CHEVROLET	TRACKER	1999	2001-11-10	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION BETWEEN 35-40 MPH, AND BOTH FRONTAL AIR BAGS DID NOT DEPLOY. DEALER / MANUFACTURER WERE NOTIFIED. FEEL FREE TO PROVIDE ANY FURTHER INFORMATION CONCERNING THIS MATTER. *AK
706419	GMC	YUKON	1999	1999-04-12	WE CONTACTED GMC CUSTOMER SERVICE (VICTOR JOHNSON) AND REQUESTED AN INVESTIGATION. GMC HAS NOW TOLD US THAT SINCE NO ONE WAS FATALLY INJURED THERE WILL BE NO INVESTIGATION. HOW CAN THEY DO THIS? MY WIFE HAS BEEN INJURED - PROBABLY PERMANENTLY- AND WE WANT TO KNOW WHY THEY DID NOT DEPLOY - AS THIS WAS A DIRECT FRONTAL IMPACT. I BELIEVE THAT THE MANUFACTURER HAS AN OBLIGATION TO US AND IS MERELY PLAYING A GAME AT THIS POINT. IS IT IN OUR BEST INTEREST TO HIRE AN ATTORNEY ON THE MATTER OR WHAT SHOULD WE DO? *AK
853931	GMC	YUKON	1999		OWNER APPLIED BRAKES AND THE VEHICLE KEPT GOING AND HIT ANOTHER VEHICLE. UPON IMPACT, NEITHER DRIVER'S SIDE NOR PASSENGER'S SIDE AIRBAGS DEPLOYED. DEALER HAS SEEN VEHICLE. *AK
862202	GMC	YUKON	1999	2000-05-17	VEHICLE WAS INVOLVED IN A FRONTAL COLLISION AT APPROXIMATELY 45 MPH WITH ANOTHER VEHICLE. UPON IMPACT, BOTH AIR BAGS FAILED TO DEPLOY. DEALER NOTIFIED. *AK
880890	GMC	YUKON	1999	2001-02-01	CONSUMER INVOLVED IN AN ACCIDENT, REARENDED ANOTHER VEHICLE. VEHICLE TRAVELING AT APPROXIMATELY 50 MPH, AND AIR BAGS DID NOT DEPLOY. PLEASE FILL IN ANY ADDITIONAL INFORMATION. *AK
8007774	ISUZU	AMIGO	1999	2002-01-25	IN A CAR CRASH AIRBAGS DID NOT DEPLOY. *AK
862789	ISUZU	RODEO	1999	2000-05-19	CONSUMER WAS GOING AT ABOUT 55 AND ANOTHER VEHICLE HIT CONSUMER'S VEHICLE AT ABOUT 85 MPH . CONSUMER'S VEHICLE, IN TURN, HIT A UTILITY VEHICLE, AND WENT INTO A GAURDRAIL. UPON IMPACT, AIRBAGS DIDN'T DEPLOY. CONSUMER'S VEHICLE WAS TOTALLED. *AK
895855	ISUZU	RODEO	1999	2001-08-10	VEHICLE WAS INVOLVED IN A DIRECT FRONTAL IMPACT AT 35MPH. UPON IMPACT, AIR BAGS DID NOT DEPLOY. PLEASE PROVIDE ADDITIONAL INFORMATION.*AK
10009019	ISUZU	RODEO	1999		THE VEHICLE WENT AIRBORNE AND LANDED ON THE FRONT END AND THE AIR BAGS FAILED TO DEPLOY.*JB
10019881	ISUZU	RODEO	1999		WHEN THE BRAKES WERE APPLIED, THE REAR OF THE VEHICLE SLID, AS A RESULT, THE CONSUMER REAR ENDED ANOTHER VEHICLE AND NONE OF THE AIRBAGS DEPLOYED. *JB
10044798	ISUZU	RODEO	1999	2003-10-27	WHILE DRIVING AT 60 MPH, HIT A DEER, AND NEITHER OF THE AIR BAGS DEPLOYED. DRIVER WORE THE SEAT BELT. *AK
10186592	ISUZU	RODEO	1999	2007-03-30	TL*- THE CONTACT OWNS A 1999 ISUZU RODEO, AND STATED THAT WHILE DRIVING ON THE ROAD AT 30 MPH THE VEHICLE IN FRONT OF THE CONTACT'S VEHICLE SLAMMED THE BRAKES SUDDENLY, CAUSING THE CONTACT TO DO THE SAME. THE CONTACT STATED THAT THE VEHICLE HAD SEVERE DAMAGE IN THE FRONT. UPON IMPAQT, THE AIRBAGS DID NOT DEPLOY. THERE WERE NO WARNING LIGHTS CONCERNING THE AIRBAGS BEFORE AND SUBSEQUENT TO THE ACCIDENT. THE CONTACT COULD PROVIDE PICTURE IF NEEDED. THE FAILURE MILEAGE WAS 96,371 MILES. *AK

EXHIBIT B



CHEVY TRUCKS

1. 1964 FORD MUSTANG
 2. 1964 FORD MUSTANG
 3. 1964 FORD MUSTANG
 4. 1964 FORD MUSTANG
 5. 1964 FORD MUSTANG
 6. 1964 FORD MUSTANG
 7. 1964 FORD MUSTANG
 8. 1964 FORD MUSTANG
 9. 1964 FORD MUSTANG
 10. 1964 FORD MUSTANG
 11. 1964 FORD MUSTANG
 12. 1964 FORD MUSTANG
 13. 1964 FORD MUSTANG
 14. 1964 FORD MUSTANG
 15. 1964 FORD MUSTANG
 16. 1964 FORD MUSTANG
 17. 1964 FORD MUSTANG
 18. 1964 FORD MUSTANG
 19. 1964 FORD MUSTANG
 20. 1964 FORD MUSTANG
 21. 1964 FORD MUSTANG
 22. 1964 FORD MUSTANG
 23. 1964 FORD MUSTANG
 24. 1964 FORD MUSTANG
 25. 1964 FORD MUSTANG
 26. 1964 FORD MUSTANG
 27. 1964 FORD MUSTANG
 28. 1964 FORD MUSTANG
 29. 1964 FORD MUSTANG
 30. 1964 FORD MUSTANG
 31. 1964 FORD MUSTANG
 32. 1964 FORD MUSTANG
 33. 1964 FORD MUSTANG
 34. 1964 FORD MUSTANG
 35. 1964 FORD MUSTANG
 36. 1964 FORD MUSTANG
 37. 1964 FORD MUSTANG
 38. 1964 FORD MUSTANG
 39. 1964 FORD MUSTANG
 40. 1964 FORD MUSTANG
 41. 1964 FORD MUSTANG
 42. 1964 FORD MUSTANG
 43. 1964 FORD MUSTANG
 44. 1964 FORD MUSTANG
 45. 1964 FORD MUSTANG
 46. 1964 FORD MUSTANG
 47. 1964 FORD MUSTANG
 48. 1964 FORD MUSTANG
 49. 1964 FORD MUSTANG
 50. 1964 FORD MUSTANG
 51. 1964 FORD MUSTANG
 52. 1964 FORD MUSTANG
 53. 1964 FORD MUSTANG
 54. 1964 FORD MUSTANG
 55. 1964 FORD MUSTANG
 56. 1964 FORD MUSTANG
 57. 1964 FORD MUSTANG
 58. 1964 FORD MUSTANG
 59. 1964 FORD MUSTANG
 60. 1964 FORD MUSTANG
 61. 1964 FORD MUSTANG
 62. 1964 FORD MUSTANG
 63. 1964 FORD MUSTANG
 64. 1964 FORD MUSTANG
 65. 1964 FORD MUSTANG
 66. 1964 FORD MUSTANG
 67. 1964 FORD MUSTANG
 68. 1964 FORD MUSTANG
 69. 1964 FORD MUSTANG
 70. 1964 FORD MUSTANG
 71. 1964 FORD MUSTANG
 72. 1964 FORD MUSTANG
 73. 1964 FORD MUSTANG
 74. 1964 FORD MUSTANG
 75. 1964 FORD MUSTANG
 76. 1964 FORD MUSTANG
 77. 1964 FORD MUSTANG
 78. 1964 FORD MUSTANG
 79. 1964 FORD MUSTANG
 80. 1964 FORD MUSTANG
 81. 1964 FORD MUSTANG
 82. 1964 FORD MUSTANG
 83. 1964 FORD MUSTANG
 84. 1964 FORD MUSTANG
 85. 1964 FORD MUSTANG
 86. 1964 FORD MUSTANG
 87. 1964 FORD MUSTANG
 88. 1964 FORD MUSTANG
 89. 1964 FORD MUSTANG
 90. 1964 FORD MUSTANG
 91. 1964 FORD MUSTANG
 92. 1964 FORD MUSTANG
 93. 1964 FORD MUSTANG
 94. 1964 FORD MUSTANG
 95. 1964 FORD MUSTANG
 96. 1964 FORD MUSTANG
 97. 1964 FORD MUSTANG
 98. 1964 FORD MUSTANG
 99. 1964 FORD MUSTANG
 100. 1964 FORD MUSTANG

- [illegible]

727 596 093

- © 2004 Blackwell Publishing Ltd *Journal of Internal Medicine* 255: 103–110

- [illegible]

- [illegible]

TABLE 1 (continued)

1999-2000

15



21

Actual savings will vary with system, wiring conditions, wiring layout and other variables. Savings reported by JPL indicate that the majority of systems will have achieved net savings.

it and its way in the city
and between
it and its way on the highway

4000 THERMALIZER AND
43 CRYO IN STAGE
FIVE HAMILTON ELECTRONIC
4000 ELECTRONIC THERM
CATALYST. PREHEAT THERM. SYSTEM

INTERNET JOURNAL OF MANAGEMENT INQUIRY, 15(3), 323-331

44-38861-1	1st Wingman
44-38861-2	2nd Wingman
44-38861-3	3rd Wingman
44-38861-4	4th Wingman
44-38861-5	5th Wingman
44-38861-6	6th Wingman
44-38861-7	7th Wingman
44-38861-8	8th Wingman
44-38861-9	9th Wingman
44-38861-10	10th Wingman
44-38861-11	11th Wingman
44-38861-12	12th Wingman
44-38861-13	13th Wingman
44-38861-14	14th Wingman
44-38861-15	15th Wingman
44-38861-16	16th Wingman
44-38861-17	17th Wingman
44-38861-18	18th Wingman
44-38861-19	19th Wingman
44-38861-20	20th Wingman

TOTAL VEHICLE & OPTIONS	\$29,550.00
DESTINATION CHARGE	\$99.00
TOTAL VEHICLE PRICE¹	\$29,649.00

Journal of Interpersonal Violence 28(12) 2249-2264
© The Author(s) 2013
Reprints and permissions: sagepub.com/journalsPermissions.nav

© 2006 Blackwell Publishing Ltd *Journal of Internal Medicine* 260: 495–503

Author's address: Department of Psychology,
University of California, San Diego,
La Jolla, CA 92037, USA.
E-mail: jacob@ucsd.edu

3M



2012 SILVERADO 1500 4WD EXT CAB LT

EXTERIOR: BLUE GRANITE METALLIC
INTERIOR: EBONY

VORTEC 5.3L V8 SFI ENGINE
6-SPEED AUTOMATIC TRANSMISSION

Visit us at www.chevy.com

STANDARD EQUIPMENT

POWER WINDOWS ARE AVAILABLE AT AN EXTRA CHARGE IN THE STANDARD EQUIPMENT PRICE.

3 YEAR / 100,000 MILE
POWERTRAIN LIMITED WARRANTY
SEE DEALER FOR DETAILS

MECHANICAL

- VORTEC 5.3L V8
- 90 ACTIVE FUEL MGT TECHNOLOGY
- 6-SPEED AUTO TRANSMISSION
- COOL OVER-DRIVE FRONT SUSP.
- MULTI-LEAF REAR SPRING SUSP.
- 2ND HANDLING/TACZING SUSP.
- ROCKED FRAME DESIGN W/
- HYPERFLEXION TECHNOLOGY
- 170 AMP ALTERNATOR
- POWER RACK AND PINION STEERING
- AUTOMATIC TRANSMISSION CASE

SAFETY & SECURITY

- 4-WHEEL ABS W/ DYNAMIC REAR PROPORTIONING
- 4-WHEEL DISC BRAKE W/ 4-WHEEL

AIR BAGS & SAFETY SENSING SYSTEM

- HEAD CURTAIN SIDE AIR BAGS W/ ROLL-OVER PROTECTION
- SEAT-MOUNTED SIDE-IMPACT AIR BAGS, DRIVER AND RIGHT FRONT PASSENGER
- THEFT DETERRANT SYSTEM
- REMOTE KEYLESS-ENTRY
- DAYTIME RUNNING LAMPS
- AUTO HEADLAMPS W/ FLASH-TO-PASS
- STABILITRAK STABILITY CONTROL W/ TRAILER SWAY CONTROL AND HILL START ASSIST
- 40 MPH CRUISE DIR. PHONE & CONNECTIONS WITH AUTOMATIC CRASH RESPONSE AND TURN-BY-TURN NAVIGATION (ASK DEALER ABOUT SECURITY CODE COVERAGE)
- SPARE TIRE LOCK
- TIRE PRESSURE MONITOR SYSTEM (DOES NOT APPLY TO SPARE TIRE)

EXTERIOR

- CHROME REAR BUMPER
- 170 DEGREE OPENING REAR DOORS
- 17" CHROME STYLED STEEL WHEELS
- 17" FULLSIZE SPARE
- ALL SEASON TIRES
- FRONT RECOVERY HOOPS
- DUAL PAIR HEATED GRAY MIRRORS
- BODY-PIECE MOLDINGS
- CHROME GRILLE
- CARGO BOX ILLUMINATION
- SOLAR RAY DEEP TINTED GLASS

INTERIOR

- AIR CONDITIONING
- POWER LOCKS AND WINDOWS
- LEATHER WRAPPED STEERING WHEEL
- ILLUMINATED VANITY MIRRORS
- 10T/10L SPLIT BENCH SEATS W/ DR. LUMBAR & LOCKING STORAGE
- HEATED SPLIT REAR SEATING
- DUAL CLOVE BOX STORAGE
- 115W FM STEREO WITH CD PLAYER

- 4-AM RADIO & SERVICE SUBSCRIPTION SOLD SEPARATELY BY SUBSCRIBER AFTER 3 MONTHS
- DRIVER INFO CENTER DISPLAY
- INTERMITTENT WIPERS
- 6-SPEAKER CLUSTER W/ AM/FM/CD
- 17-QUART AUX. POWER OUTLET
- 17-QUART STEERING WHEEL
- CRUISE CONTROL
- CARPETED FLOOR COVERING WITH VINYL MATS

OTHER

- BATTERY RUN-DOWN PROTECTION
- 9.0 LIFE MONITORING SYSTEM
- 24 HOUR ROADSIDE ASSISTANCE

OPTIONS & PRICING

WHICH FACTOR'S SUGGESTED RETAIL PRICE

STANDARD VEHICLE PRICE \$34,310.00

Visit us at www.chevy.com

1,905.00

- ALL STAR EDITION
- LOCKING REAR DIFFERENTIAL
- TRAILERING PACKAGE
- ALUMINUM WHEELS
- HEAVY DUTY COOLING
- AUTO DUAL ZONE AC
- BLUETOOTH FOR PHONE
- CD PLAYER WITH USB PORT
- STEERING WHEEL RADIO CONTROLS
- POWER SEAT ADJUSTER - DRIVER'S WAY
- FOG LAMPS
- LOOKING TAILGATE
- 22" LIFT TAILGATE

255.00

215.00

200.00

INC.

REAR AXLE 3.42 RATIO

INC.

TOTAL OPTIONS

\$2,710.00

TOTAL VEHICLE & OPTIONS

\$37,020.00

DESTINATION CHARGE

\$600.00

TOTAL BEFORE SAVINGS

\$37,620.00

ALL STAR EDITION DISCOUNT

-\$1,500.00

TOTAL VEHICLE PRICE*

\$36,120.00

EPA Fuel Economy Estimates

GASOLINE
CITY MPG

15

Expected range
for most drivers
12 to 18 MPG

*Fuel economy varies
depending on how well
your vehicle is maintained.
See Fuel Economy Guide for
more information.

FLEXIBLE FUEL VEHICLE*
GASOLINE - ETHANOL (E85)

Estimated
Annual Fuel Cost
\$3,263

based on 15,000 miles at
\$3.70 per gallon of GASOLINE

Combined GASOLINE
Fuel Economy
This Vehicle

17

10 to 21

40 STANDARD INCHES TRUCK

GASOLINE
HIGHWAY MPG

21

Expected range
for most drivers
17 to 25 MPG

Your actual
mileage will vary
depending on how you
drive and maintain
your vehicle

AGU

GOVERNMENT SAFETY RATINGS

Frontal
Crash Driver Passenger ★★★★★
★★★★★

Star ratings based on the risk of injury in a frontal impact.
Frontal ratings should only be compared to other vehicles of similar year and weight.

Side
Crash Front seat ★★★★★
Rear seat ★★★★★

Star ratings based on the risk of injury in a side impact.

Rollover ★★★★★

Star ratings based on the risk of rollover in a single vehicle crash.

Star rating range from 1 to 5 stars (★★★★★), with 5 being the highest.

Source: National Highway Traffic Safety Administration (NHTSA).

www.safercar.gov or 1-800-327-4236

PARTS CONTENT INFORMATION

FOR VEHICLES IN THIS CARLINE:
U.S./CANADIAN PARTS CONTENT: 62%
MAJOR SOURCES OF FOREIGN PARTS
CONTENT: MEXICO 34%

NOTE: PARTS CONTENT DOES NOT INCLUDE FINAL
ASSEMBLY, DISTRIBUTION, OR OTHER NON-PARTS COSTS.

FOR THIS VEHICLE:
FINAL ASSEMBLY POINT:
ROANOKE, IN U.S.A.
COUNTRY OF ORIGIN:
ENGINE: UNITED STATES
TRANSMISSION: UNITED STATES

VEHICLE IDENTIFICATION NUMBER (VIN)
SALES ORDER NUMBER (S.O.)
CHASSIS IDENTIFICATION NUMBER (CIN)
POWERTRAIN IDENTIFICATION NUMBER (PIN)
VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

VEHICLE IDENTIFICATION NUMBER (VIN)

NZ
1FA1357600

2000 ENVOY 4WD (4-DOOR)

VORTEC 4300 V6 SFI GAS ENGINE

EXTERIOR: PEWTER METALLIC

4-SPD AUTO TRANS W/ OVERDRIVE

INTERIOR: PEWTER INTERIOR TRIM

GMC

Division of General Motors Corporation

MANUFACTURER'S SUGGESTED RETAIL PRICE

STANDARD EQUIPMENT

Items Featured Below are included at NO EXTRA CHARGE in the Standard Vehicle Price Shown at Right

- TRUCK CAPABILITY EQUIPMENT:
- HIGH INTENSITY HEADLAMPS
- FULL LENGTH STEEL TRUCK FRAME
- ROOF MOUNTED CARGO RACK
- FULL SIZE SPARE TIRE
- ENGINE AND TRANS OIL COOLERS
- HEAVY DUTY BATTERY
- RECOVERY HOOKS
- 8-POINT ELECTRONIC COMPASS
- OUTSIDE TEMPERATURE GAUGE
- TOW/HAIL SHIFT PREFERENCE
- INTEGRAL FOGLAMPS
- PROTECTIVE BODYSIDE CLADDINGS
- 2 SPEED ACTIVE TRANSFER CASE
- HEAVY DUTY TRAILERING PACKAGE
- LOAD LEVELING SUSPENSION
- ON-BOARD AIR COMPRESSOR
- SAFETY & SECURITY FEATURES:
- DUAL FRONT AIR BAGS
- 4 WHEEL DISC ANTILOCK BRAKES
- PASSLOCK THEFT DETERRENT SYS.

- WINDOW LOCKOUT & CHILD LOCKS
- DAYTIME RUNNING LAMPS
- COMFORT/CONVENIENCE EQUIPMENT:
- 8-WAY PWR DRIVER SEAT
- 2-POSITION MEMORY DRIVER SEAT
- 8-WAY PWR PASSENGER SEAT
- HEATED PWR LUMBAR FRT SEAT
- ELECTRONIC CLIMATE CONTROL
- REMOTE KEYLESS ENTRY W/PANIC
- BOSE PREMIUM SOUND W/CASSETTE
- SEEK/SCAN, SSV AND CLOCK
- 6-DISC CD CHANGER
- REAR SEAT AUDIO CONTROLS
- INTERMITTENT WIPER/WASHERS
- DOOR ACTIVATED INTERIOR LAMPS
- SPLIT FOLDING REAR SEAT
- OVERHEAD AND FLOOR CONSOLE
- ELECTROCHROMIC MIRRORS
- HEATED POWER FOLDING MIRRORS
- HOMELINK TRANSMITTER TRIP COMPUTER

STANDARD VEHICLE PRICE**\$34,170.00**

Options Installed by Manufacturer

MARKETING OPTION PACKAGE - 1SG NO CHARGE

POWER SUNROOF	750.00
FULL FEATURE BUCKET SEATS	NO CHARGE
GVW RATING - 5,350 LBS	NO CHARGE
FEDERAL EMISSIONS	NO CHARGE
REAR AXLE - 3.42 RATIO	NO CHARGE
VORTEC 4300 V6 SFI GAS ENGINE	NO CHARGE
4-SPD AUTO TRANS W/ OVERDRIVE	NO CHARGE
AND ELECTRONIC CONTROL	
LIFTGATE/LIFTGLASS BODY	NO CHARGE
RR RADIO CNTRL & EARPHONE JACKS	NO CHARGE
ENVOY DECOR	NO CHARGE
SOLID COLOR	NO CHARGE

TOTAL OPTIONS**\$750.00**

MAXIMUM TOW RATING FOR THIS VEHICLE IS 5,600 LBS/ 2,540KG WITH APPROPRIATELY RATED TRAILER HITCH. TOW RATING MUST BE REDUCED BY WEIGHT OF PASSENGERS, CARGO AND OPTIONAL EQUIPMENT. SEE DEALER AND OWNER'S MANUAL FOR MORE INFORMATION.

Compare this vehicle to others in the FREE FUEL ECONOMY GUIDE available at the dealer

CITY MPG

16

HIGHWAY MPG

20**ACTUAL MILEAGE**

WILL VARY WITH DRIVING CONDITIONS, DRIVING HABITS AND VEHICLE'S CONDITION. RESULTS SUBMITTED TO EPA INDICATE THAT THE MAJORITY OF VEHICLES WITH THESE ESTIMATES WILL ACHIEVE BETWEEN

16 AND 18 MPG IN THE CITY AND BETWEEN

17 AND 20 MPG ON THE HIGHWAY.

2000 JIMMY 4WD
4.3 LITER V6 ENGINE
FUEL INJECTION/ELECT W/LOCK UP
4 SPEED TRANSMISSION
CATALYST, FEEDBACK FUEL SYSTEM

ESTIMATED ANNUAL FUEL COST: \$1,058

FOR COMPARISON SHOPPING,
ALL VEHICLES CLASSIFIED AS

SPECIAL PURPOSE

HAVE BEEN ISSUED
MILEAGE RATINGS
BASED UPON

16 TO 18 MPG CITY
AND

17 TO 20 MPG
HIGHWAY.

21148**TWA****TOTAL VEHICLE & OPTIONS \$34,920.00****DESTINATION CHARGE \$25.00****TOTAL VEHICLE PRICE* \$35,445.00**

DEALER TO WHOM DELIVERED

BOB SELLERS PONTIAC-GMC TRUCK, INC.
P.O. BOX 2070
FARMINGTON HILLS, MI 48333-2070

ORDER NO. DECKERY
STOCK CODES
DEALER NO. 21148
FINAL ASSEMBLY: NOKASH, OH U.S.A.
VIN: [REDACTED]

This deal has been approved pursuant to Federal Motor Vehicle Sales and Service Act (delivery to the ultimate purchaser). *Includes Manufacturer's Recommended Pre-Delivery Service. Dealer not include dealer-installed options and accessories. *MSRP based on MSRP. See PART NO. 10728207. ©1999 General Motors Corporation

Year: 2004
 Make: Buick
 Model: Rainier 4dr CXL AWD
 VIN: [REDACTED]

Engine: ENGINE, VORTEC 4200 MFI L6 includes transmission oil cooler (275 HP [205.1 kW] @...
 Transmission: TRANSMISSION, 4-SPEED AUTOMATIC, ELECTRONICALLY CONTROLLED WITH ...
 Exterior: Black
 Interior: Medium Pewter

MECHANICAL

- Transfer case, AWD electronic automatic system, variable driving torque percentage
- Alternator, 150 amps
- Battery, heavy-duty, includes rundown protection and retained accessory power
- All-wheel-drive
- GVWR, 5750 lbs.
- Differential, locking, heavy-duty, rear
- Rear axle, 3.73 ratio
- Suspension Package, Premium Smooth Ride
- Suspension, front, double A arm
- Suspension, rear, load-leveling, 5-link solid axle, electronically controlled air suspension
- Trailing equipment, heavy-duty, includes trailing hitch platform, 7-wire harness plus CHMSL wire and heavy-duty flasher
- Trailing wire harness, connector
- Tires, P255/60R17, all-season, blackwall
- Tire, spare, full-size, includes 17" steel wheel located at rear underbody of vehicle
- Wheels, 4 - 17" x 7" custom aluminum, 8-spoke, includes tri-shield center caps and full-size steel spare
- Steering, power
- Brakes, 4-wheel antilock, 4-wheel disc
- Fuel capacity, approximate, 22 gallons

EXTERIOR

- Luggage rack, rooftop, includes side rails
- Bumpers, front and rear, color-keyed
- Headlamps, dual halogen composite, includes flash-to-pass feature and automatic lamp control
- Daytime running lamps, includes automatic exterior lamp control
- Lamps, cornering
- Fog lamps, front, halogen
- Mirrors, outside rearview, foldaway, heated, with turn signal indicators
- Glass, Solar-Ray deep tinted
- License plate bracket, front, includes cover for states where a front license plate is not required
- Body, liftgate with liftglass, includes electric release and rear-window wiper/washer
- Wipers, intermittent, front

INTERIOR

- Custom Perforated Leather-appointed seats
- Seats, front leather-appointed reclining buckets, with adjustable head restraints; driver and passenger seat includes 8-way power adjustment and 2-way power lumbar; center console and storage pocket on passenger seat only

- Seat adjuster, power passenger 8-way
- Seats, rear, 2nd row, split-folding
- Floor mats, color-keyed, carpeted front and rear, removable
- Steering wheel, leather-wrapped rim, includes accessory controls for audio and Driver Information Center
- Steering column, Tilt-Wheel, adjustable, includes brake/transmission shift interlock
- QuietTuning, includes acoustic laminate in windshield, laminated front door glass, 26 strategically-placed elements of sound insulation, specially-selected quiet-riding tires and exhaust modifications
- Windows, power, includes driver and front passenger, express-down feature and lockout features
- Door locks, power programmable
- Keyless entry, remote, programmable, includes 2 transmitters, panic button and content theft alarm
- Driver Information Center, monitors up to 13 different systems, includes trip computer, fluid levels and door ajar
- OnStar, 1-year Safe and Sound service, includes automatic notification of air bag deployment, emergency services, roadside assistance, stolen-vehicle tracking, AccidentAssist, remote door unlock, remote diagnostics, online concierge and remote horn and lights. Drivers can also opt for other available OnStar services, including making and receiving voice-activated, hands-free phone calls with Personal Calling and getting location-based traffic and weather reports with Virtual Advisor
- Memory Package, 2-position memory, driver seat and outside rearview mirrors
- Cruise control
- Travel Note digital recorder, located in overhead console
- Universal transmitter, HomeLink, includes garage door opener, 3-channel programmable
- Theft-deterrent system, PASSlock
- Theft-deterrent alarm system, content theft alarm
- Air conditioning, dual-zone, automatic, individual climate settings for driver and right front passenger
- Defogger, rear-window, electric
- Sound system, ETR AM/FM stereo with CD and cassette player, includes seek-and-scan, digital clock, auto-tone control, speed-compensated volume, TheftLock, random select, auto-reverse cassette and Radio Data System
- Sound system feature, rear audio controls, includes headphone jacks and controls
- Cupholders, front and rear of center console
- Glovebox, passenger side of instrument panel
- Power outlets, auxiliary, covered, 2 in front bottom of instrument panel, 1 in rear of center console, 12-volt
- Lighting, perimeter with theater dimming, cargo compartment, reading lamps in all rows, door- and tailgate-activated switches, illuminated entry, exit feature and rear map lights
- Console, overhead, custom
- Visors, padded, color-keyed, driver and passenger side with cloth trim, extendable feature, illuminated vanity mirrors
- Cargo storage well

SAFETY

- Brakes, 4-wheel antilock, 4-wheel disc
- Air bags, frontal, driver and right front passenger
- Daytime running lamps, includes automatic exterior lamp control
- Door locks, child security, rear

CITY MPG

14



HIGHWAY MPG

19

Actual mileage will vary with options, driving conditions, driving habits and vehicle's condition.

New

MSRP	\$37,595.00
INSTALLED OPTIONS	
Emissions, Federal Requirements	\$0
GVWR, 5750 LBS. (2608 KG)	\$0
CXL Preferred Equipment Group	\$0
• standard equipment	
Convenience Package	\$150
• convenience net	
• rear reversible cargo mat and cargo shade	
• rear	
Pedals, Power Adjustable	\$150
Seats, Heated, Driver And Front Passenger	\$275
• separate control for back and seat cushion	
Smokers Package	\$30
• muffin ashtray and lighter	
Sunroof, Power, Tilt Sliding, Electric	\$885
With Express Open And Wind Deflector	
Original Shipping Charge	\$685
RETAIL PRICE (ORIGINALLY NEW)	\$39,770.00

Get more information on your smartphone:



BILL MARSH

www.BillMarsh.com
 800-596-2774

Year: 2012
 Make: Buick
 Model: Enclave AWD 4dr Premium
 VIN: [REDACTED]

Engine: V6 Cylinder Engine
 Transmission: TRANSMISSION, 6-SPEED AUTOMATIC
 Exterior: White Diamond Tricoat
 Interior: Titanium

MECHANICAL

- Axle, 3.16 ratio
- All-wheel drive
- Alternator, 170 amps
- Trailering provisions, 2000 lbs. (907 kg)
- GVWR, 6459 lbs. (2930 kg)
- Suspension, Premium Ride, 4-wheel independent
- Steering, power, variable effort
- Exhaust, dual with bright chromed tips

EXTERIOR

- Luggage rack side rails, roof-mounted, chromed
- Headlights, articulating
- Fog lamps, front, halogen, with projector technology
- Glass, Solar-Ray deep-tinted, rear-side, quarter panel and liftgate
- Wipers, front intermittent with structureless wiper blades
- Wiper, rear intermittent with washer
- Liftgate, rear power

ENTERTAINMENT

- SiriusXM Satellite Radio is standard on nearly all 2012 GM models. Enjoy a 3-month trial to the 'XM Select' package, with over 170 channels including commercial-free music, all your favorite sports, exclusive talk and entertainment. And now add premium channels to your trial at no-cost. Welcome to the world of satellite radio. (Requires a subscription sold separately by SiriusXM after the trial period. If you decide to continue your service at the end of your subscription, service will automatically renew and bill, at the rates in effect at the time of renewal, until you call SiriusXM at 1-866-635-2349 to cancel. See our Customer Agreement for complete terms at www.siriusxm.com. Available only to those at least 18 and older in the 48 contiguous USA and D.C. Replaced by (UBS) NavTraffic when (UUM) Audio system with Navigation or (U4H) Audio system with Rear Seat Entertainment are ordered.)
- Bluetooth for phone personal cell phone connectivity to vehicle audio system and HMI (Human Machine Interface)

- QuietTuning Buick exclusive process to reduce, block and absorb noise and vibration to create a quiet interior cabin

INTERIOR

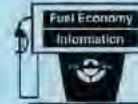
- Seat adjuster, 4-way power front passenger (fore-aft and recline), power lumbar
- Floor mats, front and rear auxiliary, covering (Floor mats first, second and third row.)
- Steering wheel, leather-wrapped with Mahogany wood accents
- Instrumentation includes Driver Information Center, tachometer, speedometer, fuel, coolant temperature, battery, gear selector, outside air temperature and compass display (Digital compass display moves to navigation screen with (UUM) Audio system with Navigation and (U4H) Audio system with Rear Seat Entertainment and Navigation.)
- Instrumentation, engine oil life monitor
- Windows, power with driver Express-Up and -Down features, passenger Express-Down feature
- Universal Home Remote, includes garage door opener, 3-channel programmable
- Theft-deterrent system, vehicle, PASS-Key III, engine immobilizer with content theft alarm
- Air conditioning, tri-zone automatic climate control with individual climate settings for driver and right front passenger and rear seat occupants
- Defogger, rear-window electric
- Glovebox, locking, passenger-side of instrument panel
- Mirror, inside rearview auto-dimming
- Visors, driver and front passenger illuminated vanity mirrors

SAFETY

- Brakes, 4-wheel antilock, 4-wheel disc
- Air bags, dual-stage frontal and side-impact, driver and front passenger and side curtain for first, second and third row outboard passengers with Passenger Sensing System and roll over protection (Always use safety belts and child restraints. Children are safer when properly secured in a rear seat in the appropriate child restraint. See the Owners Manual for more information.)
- Door locks, rear child security
- Tire Pressure Monitor System

CITY MPG

16



HIGHWAY MPG

22

Actual mileage will vary with options, driving conditions, driving habits and vehicle condition.

New

MSRP	\$45,765.00
INSTALLED OPTIONS	
Emissions, Federal Requirements	\$0
1 SN Preferred Equipment Group	\$0
* Standard Equipment	
Wheels, 20" (50.8 CM) Chrome Clad Aluminum	\$300
Tires, P255/55 R20 All Season, Blackwall	\$0
Wheel, 17" (43.2 CM) Compact Steel Spare Wheel And Tire	\$0
White Diamond Tricoat	\$795
Titanium, Perforated Leather Seating Surface	\$0
Audio System With Rear Seat Entertainment And Navigation	\$3,185
Sunroof, Power	\$1,400
License Plate Bracket, Front Mounting Package	\$15
Navtraffic	\$0
Original Shipping Charge	\$825
RETAIL PRICE (ORIGINALLY NEW)	\$52,285.00

Get more information on your smartphone:



Pilson Auto Centers

pilsonauto.com
 217-234-6461

Year: 2014
 Make: Buick
 Model: Encore AWD 4dr Leather
 VIN: [REDACTED]

Engine: 4 Cylinder Engine
 Transmission: TRANSMISSION, 6-SPEED AUTOMATIC, ELECTRONICALLY CONTROLLED WITH ...
 Exterior: Quicksilver Metallic
 Interior: Ebony

MECHANICAL

- Axle, 3.53 final drive ratio
- Drivetrain, all-wheel drive
- Alternator, 130 amps
- Suspension, Ride and Handling
- Steering, power, variable effort, electronic
- Exhaust system, rear exit
- Exhaust tip, styled stainless-steel
- Keys, ignition, foldable
- Mechanical jack

EXTERIOR

- Tires, P215/55R18 all-season, blackwall
- Tire, compact spare 16", located under cargo floor
- Fascias, front and rear accent color includes rocker moldings
- Headlamps, halogen composite projector beam with blue translucent ring and automatic exterior lamp control
- Fog lamps, front
- Lamp, center high-mounted stop/brake
- Glass, acoustic, laminated
- Glass, deep-tinted
- Windshield, solar absorbing
- Mirrors, outside heated power-adjustable, body-color, manual-folding with turn signal indicators
- Door handles, body-color with chrome strips
- Wipers, front intermittent with pulse washers
- Wiper, rear intermittent
- Vehicle protection, corrosion preventative
- Steering wheel, leather-wrapped 3-spoke, color-keyed with theft-deterrent locking feature
- Steering wheel, heated
- Steering wheel controls, mounted audio and phone interface controls
- Driver Information Center includes tachometer, speedometer, fuel, coolant temperature, battery and compass
- Instrumentation, outside temperature display, located on audio system
- Instrumentation, analog with mpg speedometer and tachometer
- Oil life monitoring system
- Cruise control, electronic with set and resume speed
- Air conditioning, dual-zone automatic climate control with individual climate settings for driver and right front passenger
- Air filter, particle
- Defogger, rear-window electric
- Shift knob, satin silver and chrome
- Glovebox, dual
- Power outlet, 120-volt, located on the rear of center console
- Mirror, inside rearview auto-dimming
- Visors, driver and front passenger illuminated vanity mirrors, covered
- Lighting, interior, dimming instrument panel cluster
- Lighting, interior, Ice Blue ambient, located on instrument panel
- Lighting, interior, overhead courtesy lamp
- Lighting, interior, rear cargo compartment lamp
- Cargo storage, tray under rear floor
- Cargo cover, rear, stowable and removable
- Side Blind Zone Alert

ENTERTAINMENT

- Antenna, roof-mounted
- Audio system feature, 6-speaker system
- Audio system feature, color display, 7" diagonal
- QuietTuning Buick exclusive process that consists of acoustically enhanced windshield and side glass, along with numerous noise canceling acoustic treatments to reduce, block and absorb noise and vibration to create a quiet interior cabin
- Noise control system, active noise cancellation

INTERIOR

- Memory Package driver side "presets" for seat position
- Seats, heated driver and front passenger
- Seat adjuster, driver 6-way power with manual recline and power lumbar adjustment
- Seat adjuster, front passenger 6-way power with manual recline and power lumbar adjustment
- Seatback, passenger flat-folding
- Headrests, 2-way adjustable, up/down
- Door sill plate cover, front
- Steering column, tilt and telescopic, adjustable

CITY MPG

23



HIGHWAY MPG

30

Actual mileage will vary with options, driving conditions, driving habits and vehicle condition.

INSTALLED OPTIONS

Emissions, Connecticut, Delaware, Maine, \$0
 Maryland, Massachusetts, New Jersey,
 New York, Oregon, Pennsylvania, Rhode
 Island, Vermont And Washington State
 Requirements

1 SL Preferred Equipment Group \$0

- Standard Equipment

Quicksilver Metallic \$0

- (BT3) Dark Argent Metallic lower accent color

Dark Argent Metallic Lower Accent Color included

Ebony, Leather Appointed Seats \$0

Audio System With Navigation, \$795

Am/Fm/Siriusxm Stereo, Single CD Player
 And MP3 Player

- navigation
- IntelliLink 7" diagonal color LCD display
- GPS navigation system
- USB port
- Radio Data System (RDS) and auxiliary input jack

License Plate Bracket, Front Mounting \$0

Package

Original Shipping Charge \$925

SAFETY

- Brakes, 4-wheel antilock, 4-wheel disc
- StabiliTrak, stability control system
- Daytime Running Lamps, reduced intensity low beam
- Air bags, frontal and knee for driver and front passenger, side-impact seat-mounted and roof rail for front and rear outboard seating positions
- Air bag, Passenger Sensing System, sensor indicator inflatable restraint, front passenger/child presence detector
- Safety belts, 3-point, driver and front passenger height-adjustable with load limiters
- Safety belts, 3-point rear, all seating positions
- Restraint provisions, child, Isofix 2 point only, point/latch includes 3 top tether points
- Rear Cross-Traffic Alert
- Rear Vision Camera
- Door locks, child security, rear, electrical
- Tire Pressure Monitor, manual learn
- Horn, dual note tone



Credit Now
Maine's #1 Used Vehicle Dealer

www.creditnow.com

866-864-9899

Year: 2012
 Make: Cadillac
 Model: Escalade 2WD 4dr Platinum Edition
 VIN: [REDACTED]

Engine: 8 Cylinder Engine
 Transmission: TRANSMISSION, 6-SPEED AUTOMATIC, HEAVY-DUTY, 6L80E, ELECTRONICALLY.
 Exterior: White Diamond Tricoat
 Interior: Cocoa/Light Linen

MECHANICAL

- Throttle control, electronic
- Cooling, external engine oil cooler, heavy-duty
- Cooling, external transmission oil cooler, heavy-duty air-to-oil
- Rear wheel drive
- Differential, heavy-duty locking rear
- Rear axle, 3.42 ratio
- Battery, heavy-duty with rundown protection and retained accessory power
- Alternator, 160 amps
- Trailing equipment, heavy-duty includes trailing hitch platform, 7-wire harness with independent fused trailing circuits and 7-way sealed connector
- GVWR, 7100 lbs.
- Suspension, front independent, SLA, coil over shock and stabilizer bar
- Suspension, rear 5-link coil springs
- Automatic level control, heavy-duty, air
- Steering, power, rack-and-pinion
- Exhaust, dual-outlet stainless-steel

EXTERIOR

- Tires, P285/45R22, all-season, blackwall TL AL2
- Tire inflation kit
- Fascia, front, body-color
- Fascia, rear, body-color
- Moldings, color-keyed bodyside with chrome accents
- Headlamps, LED
- Headlamps, Twilight Sentinel automatic delay
- Headlamps, IntelliBeam
- Fog lamps, front rectangular halogen, integral in front fascia
- Tail lamps, LED illumination
- Mirrors, outside heated power-adjustable, power-folding and driver-side auto-dimming, color-keyed with integrated turn signal indicators, ground illumination and programmable to provide curb view when in reverse
- Wipers, front intermittent

- Wiper, rear intermittent with washer
- Door handles, chrome
- Body, power liftgate

ENTERTAINMENT

- Bluetooth for phone, personal cell phone connectivity to vehicle audio system and HMI
- NavTraffic is available in over 100 markets and works with your vehicle's navigation system to give you continuously updated traffic data right when you need it most - while you're driving. You'll avoid traffic tie-ups, save time and gas by getting alternate routes, and, in some cases, receive traffic speed and drive-time information. Plus, you can use NavTraffic at the same time you're enjoying SiriusXM Satellite Radio. You'll find that once you start using NavTraffic, you won't want to drive without it.
- Audio system feature, Bose 5.1 Cabin Surround Sound system with 10 speakers

INTERIOR

- Seat release, second row, power for tumble and fold
- Floor covering, color-keyed carpeting
- Steering wheel, power-tilt, color-keyed with wood and leather-wrapped rim, locking.
- Steering wheel controls, mounted audio and Driver Information Center controls
- Instrumentation, analog with speedometer, odometer, fuel level, engine temperature and tachometer
- Windows, power with driver and front passenger Express-Up/Down and lockout features
- Pedals, power-adjustable for accelerator and brake
- Remote vehicle start, adaptive
- Cruise control, electronic with set and resume speed
- Theft-deterrent system, vehicle, PASS-Key III+
- Cup holders, quad front, dual second row and single third row
- Cup holders, heated and cooled
- Mirror, inside rearview auto-dimming, includes OnStar controls.
- Visors, driver and front passenger illuminated vanity mirrors with extenders

SAFETY

- Brakes, 4-wheel antilock, 4-wheel disc, VAC power
- Daytime Running Lamps with automatic exterior lamp control
- Air bags, head curtain side-impact, first, second and third row outboard seating positions with rollover sensor
- Air bags, seat-mounted side-impact, driver and right-front passenger for thorax and pelvic protection
- Rear Park Assist
- Rear Vision Camera
- Safety belts, first and second row belts to body, third row belts to seat, lap and shoulder all seating positions
- Door locks, child rear security

CITY MPG

14



HIGHWAY MPG

18

Actual mileage will vary with options, driving conditions, driving habits and vehicle condition.

New

MSRP	\$79,945.00
INSTALLED OPTIONS	
Emissions, Federal Requirements	\$0
Platinum Edition Preferred Equipment Group	\$0
* Standard Equipment	
White Diamond Tricoat	\$0
Cocoa/Light Linen, Tehama Full Leather Seats With Mini Perforated Inserts	\$0
Audio System With Navigation, Compact Flash, Am/Fm/Siriusxm Stereo With MP3/CD/DVD Video/Audio Changer	\$0
Lpo, Wheel Locks	\$55
Original Shipping Charge	\$995
RETAIL PRICE (ORIGINALLY NEW)	\$80,995.00

Get more information on your smartphone:



www.AtlantaAutos.com
 678-213-4455

Year: 2005
 Make: GMC
 Model: Yukon XL 4dr 1500 4WD SLT
 VIN: [REDACTED]

Engine: 8 Cylinder Engine
 Transmission: TRANSMISSION, 4-SPEED AUTOMATIC, electronically controlled with overdrive.
 Exterior: Sport Red Metallic
 Interior: Pewter/Dark Pewter

MECHANICAL

- Battery, heavy-duty, 600 cold-cranking amps, includes rundown protection and retained accessory power
- Alternator, 160 amps
- Trailing wiring harness, 7-wire
- Recovery hooks, 2 front, frame-mounted
- GVWR, 7200 lbs.
- Suspension Package, Premium Smooth Ride, includes 46mm diameter high pressure gas shocks
- Suspension, front, independent torsion bar, and stabilizer bar
- Suspension, rear, multi-link with coil springs
- Tire carrier, lockable, outside spare, winch-type mounted under frame at rear
- Steering, power
- Fuel capacity, approximate, gallon 31
- Exhaust, aluminized stainless-steel muffler and tailpipe
- Tools, mechanical jack and wheel wrench, stored in rear quarter trim

EXTERIOR

- Luggage rack, roof-mounted, Black
- Bumper, front, chrome
- Bumper, rear, chrome step, includes pad
- Air dam, Gray
- Moldings, bodyside, body-color, with bright insert
- Grille, chrome surround
- Assist steps, Black, mounted between front and rear wheels at bottom of rocker panel
- Headlamps, dual halogen composite, includes flash-to-pass feature and automatic lamp control
- Fog lamps, front, rectangular, halogen
- Glass, Solar-Ray deep tinted
- Body, liftgate with liftglass, rear door system, includes rear-window wiper/washer

INTERIOR

- SLT decor
- Seats, middle leather appointed 60/40 split-folding bench, 3-passenger with center armrest, storage tray and rear passenger easy entry
- Seats, rear 3rd row vinyl bench, 3-passenger, 1-piece removable

- Cupholders, in front seating area
- Cupholders, in rear of floor console
- Cupholders, driver and passenger side in 3rd row side trim
- Smokers Package, includes ashtray and lighter
- Floor covering, color-keyed carpeting
- Floor mats, color-keyed, carpeted front and 2nd row, removable
- Steering column, Tilt-Wheel, adjustable, includes brake/transmission shift interlock
- Steering wheel, leather-wrapped rim, Black
- Steering wheel, mounted controls, includes audio and driver information center controls
- Driver Information Center, full functionality, monitors numerous systems
- Tire pressure monitoring system
- Instrumentation, analog, includes speedometer, odometer with trip odometer, fuel level, voltmeter, engine temperature, oil pressure and tachometer
- Warning tones, headlamp on, key-in-ignition, buckle-up reminder, turn signal on
- Windows, power, includes driver express-down and lockout features
- Cruise control, electronic with set and resume speed, includes telltale in instrument panel cluster
- Heater and defogger, includes front and side window defoggers, rear passenger heating ducts and heater, rear auxiliary
- Defogger, rear-window, electric
- Sound system feature, Bose Premium speaker system, 9 speakers, includes subwoofer in center console
- OnStar, 1-year Safe and Sound Service, includes automatic notification of air bag deployment, stolen vehicle tracking, emergency services, roadside assistance, remote door unlock, remote horn and lights, GM Goodwrench remote diagnostics, AccidentAssist and online concierge. Drivers can also obtain the available voice-activated, hands-free Personal Calling service and Virtual Advisor that provides location-based traffic and weather reports and other personalized information
- Door trim, lights on front doors, side reflectors on rear doors
- Armrests, driver and passenger doors, padded
- Mirror, inside rearview, electrochromic, 8-point compass, outside temperature indicator and right front passenger air bag status
- Visors, padded, Shale-colored, driver and passenger side with cloth trim, extenders, illuminated vanity mirrors and corner storage pockets on back of visors
- Assist handles, front passenger and outboard 2nd row seats
- Coat hooks, driver and passenger side, rear seat and cargo area
- Storage bin, behind rear driver side quarter panel

SAFETY

- Air bags, frontal, dual-stage, driver and right front passenger, includes Passenger Sensing System
- Brake/transmission shift interlock

CITY MPG

14



HIGHWAY MPG

18

Actual mileage will vary with options, driving conditions, driving habits and vehicle condition.

New

MSRP	\$42,155.00
INSTALLED OPTIONS	
Suspension Package, Autoride	included
Emissions, Federal Requirements	\$0
SLT Preferred Equipment Group	\$5,080
Tires, P265/70 R17, All Season, White Outlined Letter	\$125
Seats, Front Leather Seating Surfaces	included
Power Reclining Full Feature Buckets	
Sound System, Etr Am/Fm Stereo With 6 Disc CD Changer	included
Wheels, 4 17" X 7.5" (43.2 CM X 19.1 CM) 6 Spoke Premium Aluminum Ultra Bright Polish	\$645
Safe And Secure Package	\$1,470
Sun, Sound And Entertainment Package	\$2,720
Trailing Equipment, Heavy Duty	\$330
Air Cleaner, High Capacity	\$0
Cooling, External Transmission Oil Cooler, Heavy Duty Air To Oil	included
Cargo Package	included
Mirrors, Outside Rearview, Power Folding, Power Adjustable, Heated, Color Keyed, Driver Side Electrochromic	included
Air Bags, Side Impact, Driver And Right Front Passenger	included
Entertainment System, Rear Seat Pedals, Power Adjustable	included
Sound System Feature, XM Satellite Radio.	included
Sunroof, Power, Tilt Sliding, Electric Universal Transmitter, Homelink	included
Customer Dialogue Network	\$0
Original Shipping Charge	\$850
RETAIL PRICE (ORIGINALLY NEW)	\$53,375.00

 **BILL MARSH**

www.BillMarsh.com
 800-596-2774

Year: 2007
 Make: GMC
 Model: Acadia FWD 4dr SLT
 VIN: [REDACTED]

Engine: V6 Cylinder Engine
 Transmission: Automatic 6-spd
 Exterior: Liquid Silver Metallic
 Interior: Ebony

MECHANICAL

- Axle, 3.16 ratio
- Front wheel drive
- Alternator, 170 amps
- GVWR, 6400 lbs. (2903 kg)
- Suspension, Ride and Handling
- Steering, power, variable effort
- Exhaust, double dual with chrome tips

EXTERIOR

- Spoiler, rear
- Roof rails, brushed aluminum, longitudinal
- Moldings, body-color bodyside
- Headlamps, dual halogen projector lamp
- Headlamp control, automatic on and off
- Fog lamps, front round halogen
- Glass, Solar-Ray deep-tinted (all windows except light-tinted glass on windshield and driver- and front passenger-side glass)
- Door handles, chrome (Bright beltline molding.)
- Wipers, front intermittent with washers
- Wiper, rear intermittent with washer
- Body, manual rear liftgate

INTERIOR

- Seats, heated driver and front passenger
- Console, front center with 2 cup holders and storage

- Cup holders, 2 front on the floor console
- Cup holders, 2 in the second row
- Floor mats, color-keyed carpeted front, second and third row, removable
- Floor covering, color-keyed carpeting
- Insulation, acoustical package
- Steering wheel, leather-wrapped with redundant audio controls
- Steering wheel, Tilt-Wheel and telescopic with brake/transmission shift interlock
- Instrumentation, 5-gauge with Enhanced Driver Information Center and outside temperature indicator
- Tire Pressure Monitoring System
- Cruise control, electronic with set and resume speed
- OnStar, 1-year of Directions and Connections plan. Includes the innovative easy to use Turn-by-Turn Navigation services which provide voice-guided directions (where available). Also includes Automatic Notification of Air Bag Deployment, Stolen Vehicle Location Assistance, Emergency Services, Roadside Assistance, Remote Door Unlock, OnStar Vehicle Diagnostics, Hands-Free Calling, AccidentAssist, Remote Horn and Lights, Information and Convenience Services, and Driving Directions (OnStar services require vehicle electrical system (including battery), wireless service and GPS satellite signals to be available and operating for features to function properly. OnStar acts as a link to existing emergency service providers. Stolen Vehicle Location Assistance and Remote Door Unlock success varies with conditions. OnStar Vehicle Diagnostic available on most 2004 MY and newer GM vehicles. Diagnostic capability varies by model. Turn-by-Turn Navigation requires ABS and is not available in certain areas. Visit onstar.com or call 1-888-466-7827 for system limitations and details)
- Universal Home Remote, includes garage door opener, 3-channel programmable
- Theft-deterrent system, vehicle, PASS-Key III, engine immobilizer
- Defogger, rear-window, electric
- Audio system controls, rear with 2 headphone jacks (headphones not included) and controls for volume, station selection and media
- Antenna, Quad-Band for AM/FM stereo and OnStar
- Mirror, inside rearview auto-dimming with 8-point compass display
- Visors, driver and front passenger, padded with cloth trim, color-keyed
- Cargo storage, under rear floor

SAFETY

- Door locks, rear child security
- Horn, dual-note

CITY MPG

16



HIGHWAY MPG

22

Actual mileage will vary with options, driving conditions, driving habits and vehicle's condition.

New

MSRP	\$33,225.00
INSTALLED OPTIONS	
Body, Power Rear Liftgate	included
Emissions, Federal Requirements	\$0
SLT 2 Preferred Equipment Group	\$0
Tires, P255/55 R19 H Rated	\$0
Audio System With Navigation, Am/Fm Stereo With MP3 Compatible CD/DVD Player And DVD Based Navigation	\$2,145
Wheels, 4 19" X 7.5" (48.3 CM X 19.1 CM) Machined Ultrabright Aluminum	\$1,295
Mirrors, Outside Heated Power Adjustable, Power Folding And Driver Side Auto Dimming, Body Color	included
Audio System Controls, In The Rear Cargo Area	\$150
Cargo Package	included
Convenience Package	included
Trailer Package	\$425
Trailer Hitch, Factory Installed	included
Entertainment System, Rear Seat DVD Player	\$1,295
Audio System Feature, Bose Advanced 10 Speaker System	\$0
XM Satellite Radio.	included
Antenna, Quad Band	included
Head Up Display	\$350
Power Outlet, 3 Prong Household Style, 115 Volt	included
Remote Vehicle Start	included
Seat, 8 Way Power Driver	included
Seat, 4 Way Power Passenger	included
Sunroof, Dual Skyscape 2 Panel Power, Tilt Sliding Front And Fixed Rear	\$1,300
Washer Nozzles, Heated Windshield	included
Original Shipping Charge	\$735
RETAIL PRICE (ORIGINALLY NEW)	\$40,920.00

 **BILL MARSH**

www.BillMarsh.com
 800-596-2774

Year: 2009
 Make: GMC
 Model: Yukon XL Denali AWD 4dr 1500
 VIN: [REDACTED]

Engine: 8 Cylinder Engine
 Transmission: TRANSMISSION, 6-SPEED AUTOMATIC, HEAVY-DUTY, ELECTRONICALLY CONTR.
 Colors: Summit White / Ebony
 Mileage: 200,006

Stock #: 2019-321

MECHANICAL

- Rear axle, 3.42 ratio
- Tow/haul mode selector button located at end of shift lever
- Cooling, external engine oil cooler, heavy-duty air-to-oil integral to driver side of radiator
- Cooling, auxiliary external transmission oil cooler, heavy-duty air-to-oil
- Transfer case, AWD, electronic automatic system
- All-wheel drive
- Alternator, 160 amps
- Recovery hooks, 2 front, frame-mounted
- Differential, heavy-duty locking rear
- GVWR, 7400 lbs.
- Suspension Package, Autoride, bi-state variable shock dampening and rear air-assisted load-leveling includes automatic air level control
- Suspension, front coil-over-shock with stabilizer bar
- Suspension, rear multi-link with coil springs
- Trailer equipment, heavy-duty includes trailering hitch platform, 7-wire harness with independent fused trailering circuits mated to a 7-way sealed connector and 2" trailering receiver
- Steering, power
- Brakes, 4-wheel antilock, 4-wheel disc
- Exhaust, aluminum stainless-steel muffler and tailpipe
- Tools, mechanical jack and wheel wrench stored in rear quarter trim

EXTERIOR

- Wheels, 4-20" x 8.5" chrome aluminum
- Tires, P275/55R20 all-season, blackwall
- Wheel, 17" full-size, steel spare
- Tire, spare P265/70R17
- Tire carrier, lockable outside spare winch-type mounted under frame at rear
- Fascia, front color-keyed
- Fascia, rear color-keyed
- Luggage rack, roof-mounted, body-color with bright accent
- Luggage rack center rails
- Moldings, body-color bodyside with bright inserts
- Grille, chrome surround
- Assist steps, Black with chrome insert, mounted between the front and rear wheels
- Headlamps, projector beam with automatic exterior lamp control and flash-to-pass feature
- Fog lamps, front round, halogen
- Mirrors, outside heated power-adjustable, power-folding and driver-side auto-dimming, body-color, with integrated turn signal indicators, ground illumination and curb-tilt
- Glass, Solar-Ray deep-tinted
- Wipers, front intermittent, Rainsense
- Wiper, rear intermittent with washer
- Liftgate with liftglass, rear door system with rear-window wiper/washer
- Liftgate, rear power-operated controlled from front overhead console, remote key fob or button inside liftgate

ENTERTAINMENT

- Audio system, AM/FM stereo with MP3 compatible 6-disc in-dash CD changer seek-and-scan, digital clock and auto-tune control
- Audio system feature, Bose Centerpoint Surround Sound 10-speaker system
- XM Radio, XM Radio includes 3 trial months of service. XM turns your world on with commercial-free music channels from Rock to Jazz, Country to Classical, Latin Pop to Hip Hop, and virtually everything in between, all in amazing digital sound. Turn on your favorite Sports with every Major League Baseball game from Opening Day until the World Series, NHL Hockey, the PGA TOUR and college football and basketball. Plus XM brings you the biggest names in news and talk, outrageous comedy, award-winning family programming -- wherever you go from coast to coast. Exclusive live concerts, Oprah and Friends, Radio Disney, and so much more. Find what turns you on
- Audio system controls, rear with 2 headphone jacks, power outlet and controls for volume, station selection and media
- Bluetooth for phone personal cell phone connectivity to vehicle audio system

INTERIOR

- Seats, front bucket with leather-appointed seating, 12-way power driver and front passenger seat adjusters, including power lumbar control, power recline, heated seat cushion and seatbacks, 2-position driver memory, adjustable head restraints, storage pockets and floor console
- Seat adjuster, driver power
- Seat adjuster, front passenger power

- Seats, heated second row
- Seat release, second row, power release only
- Seats, third row 50/50 split-bench with vinyl, 3-passenger removable, all-belts-to-seat
- Console, floor with storage area, 4 cup holders and integrated second row audio and HVAC controls
- Cup holders, in front seating area
- Cup holders, in rear of floor console
- Cup holders, driver and passenger-side in third row side trim
- Floor covering, color-keyed carpeting
- Floor mats, color-keyed carpeted front and second row removable
- Acoustical Insulation Package, premium
- Steering column, Tilt-Wheel, adjustable with brake/transmission shift interlock
- Steering wheel, Deluxe, leather-wrapped with power-tilt
- Steering wheel, heated
- Steering wheel controls, mounted audio and cruise controls includes Driver Information Center controls
- Driver Information Center, full-functionality included with temperature and compass
- Instrumentation, analog with speedometer, odometer with trip odometer, fuel level, voltmeter, engine temperature, oil pressure and tachometer
- Warning tones headlamp on, key-in-ignition, driver and passenger buckle up reminder and turn signal on
- Windows, power with driver Express-Down and lockout features
- Door locks, power programmable with lockout protection
- Remote vehicle starter system includes Remote Keyless Entry
- Pedals, power-adjustable for accelerator and brake, includes Rear Parking Assist
- Universal Home Remote includes garage door opener, 3-channel programmable
- Cruise control, electronic with set and resume speed
- Air conditioning, tri-zone automatic climate control with individual climate settings for driver and right-front passenger
- Air conditioning, rear auxiliary
- Heater, rear auxiliary with rear passenger heating ducts
- Defogger, rear window electric
- Rear Parking Assist, Ultrasonic with rearview LED display and audible warning
- Theft-deterrent system: vehicle, PASS-Key III
- Door trim, side reflectors on the rear doors
- Armrests, driver and passenger doors, padded
- Mirror, inside rearview auto-dimming
- Console, overhead mini with map lights
- Visors, driver and front passenger illuminated vanity mirrors, padded with cloth trim, extends on rod, Shale-colored
- Assist handles, front passenger and second row outboard
- Coat hooks, driver- and passenger-side rear seat and cargo area
- Lighting, interior with dome light, driver- and passenger-side door switch with delayed entry feature, cargo lights, door handle or Remote Keyless Entry-activated illuminated entry and map lights in front and second seat positions
- Power outlets, 4 auxiliary with covers, 12-volt, 3 in floor console, 1 in cargo area
- Storage bin, behind driver-side rear quarter panel
- Cargo mat

SAFETY

- StabiliTrak, stability control system with traction control
- Air bags, dual-stage frontal, driver and right-front passenger with Passenger Sensing System
- Air bags, head curtain side-impact, first and second row outboard seating positions with rollover sensor, includes third row seating positions with 3-passenger third row bench seat
- OnStar, 1-year of Directions and Connections plan. Includes the innovative easy to use Turn-by-Turn Navigation services which provide voice-guided directions. Also includes Automatic Crash Notification, Automatic Notification of Air Bag Deployment, Stolen Vehicle Location Assistance, a link to all Emergency Services, Roadside Assistance, Remote Door Unlock, OnStar Vehicle Diagnostics, Hands-Free Calling, AccidentAssist, Remote Horn and Lights, Information and Convenience Services, and Driving Directions
- LATCH system for child safety seats
- Tire Pressure Monitoring System

CITY MPG**12****HIGHWAY MPG****19**

Actual mileage will vary with options, driving conditions, driving habits and vehicle's condition.

New

MSRP	\$55,935.00
INSTALLED OPTIONS	
Emissions, Federal Requirements	\$0
Preferred Equipment Group	\$0
• standard equipment	
Solid Paint	\$0
Summit White	\$0
Ebony, Perforated Nuance Leather	\$0
Appointed Seat Trim	
Audio System With Navigation, Am/Fm	included
Stereo With MP3 Compatible CD/DVD	
Player And DVD Based Navigation	
Sun, Entertainment And Destinations	\$4,790
Package	
• (UVB) AM/FM stereo MP3 compatible CD/DVD player and DVD-based navigation	
• (U47) rear seat entertainment system	
• (UVC) rearview camera system and (CF5) power sunroof	
• (CF5) power sunroof	
Sunroof, Power, Tilt Sliding	included
• express-open and close and wind deflector	
License Plate Bracket, Front	\$15
Entertainment System, Rear Seat DVD	included
Player	
• remote control	
• overhead display	
• 2 sets of 2-channel wireless infrared headphones and auxiliary audio/video input jacks	
Seats, Heated And Cooled, Seat	\$650
Cushion And Seat Back For Driver And	
Front Passenger	
Rearview Camera System	included
XM Navtraffic	\$0
Customer Dialogue Network	\$0
Original Shipping Charge	\$950
RETAIL PRICE (ORIGINALLY NEW)	\$62,340.00



www.redsautoandtruck.com
 303-726-5520

EXHIBIT C

Richard Heimann (CA State Bar # 063607)
Nimish R. Desai (CA State Bar # 244953)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery St., 29th Fl
San Francisco, CA 94111-3339
Telephone: 415-956-1000
Facsimile: 415-956-1008
rheimann@lchb.com
ndesai@lchb.com

David S. Stellings (*pro hac vice*)
Katherine I. McBride (*pro hac vice*)
Jessica A. Moldovan (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: 212.355.9500
Facsimile: 212.355.9592
dstellings@lchb.com
kmcbride@lchb.com
jmoldovan@lchb.com

Attorneys for Plaintiffs

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

James Milstead et al,

Case No. 4:21-cv-06338-JST

Plaintiffs,

**CLRA VENUE DECLARATION OF
ARTHUR RAY PURSUANT TO
CALIFORNIA CIVIL CODE
SECTION 1780(d)**

v.

GENERAL MOTORS LLC, et al.,

Defendant.

I, ARTHUR RAY, declare as follows:

1. I have personal knowledge of the facts stated herein and, if called upon to do so, could competently testify thereto.

2. I am a Plaintiff in the above-captioned action.

3. I submit this declaration in support of the Complaint in this case, which is based in part on violations of the Consumers Legal Remedies Act, California Civil Code section 1750 *et seq.*

4. I understand that General Motors LLC, General Motors Company, and General Motors Holdings LLC have their principal places of business and generally conduct business in Detroit, Michigan.

5. The Complaint has been filed in the proper place for trial of this action.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on January 26, 2023 in Brentwood, Contra Costa County, California.

By:


ARTHUR RAY

EXHIBIT D

Forensic Report
May 26, 2022

File: McCoy vs. GM – 2018 GMC Sierra HD

Subject: Vehicle Safety Performance

Preliminary:

My name is Chris Caruso. I am an engineer working as a consultant in the area of automotive safety. I have been asked to provide my analysis and opinions in this case.

A true and correct copy of my *curriculum vitae* is attached as Exhibit A. As set forth in my *curriculum vitae*, I graduated in 1986 with a Master of Science in Engineering from Arizona State University. Before earning my Master's degree in Engineering (MSE) at ASU, I obtained a Bachelor of Science degree in Electrical Engineering (BSEE) and Mechanical Engineering (BSME) from General Motors Institute in 1984.

I worked as an engineer in training at General Motors Corporation ("GM") in Trenton, New Jersey from 1979 to 1986. From 1986 to 1987, I was employed as a Systems Engineer in the Advanced Vehicle Systems division of Delco Systems Operations (DSO) in Santa Barbara, California. During this time in the Advanced Vehicle Systems division, my work involved the engineering design and development of a variety of vehicle safety systems.

From 1987 to 1989, I served as Delco Electronics Resident Engineer at Breed Automotive Corporation in Boonton, New Jersey. During this time I was involved in the development and implementation of the second generation of airbag systems on GM vehicles and their subsidiaries in the US and overseas and the first generation of ball/tube sensing systems for GM and their worldwide subsidiaries vehicles.

From 1989 to 1995, I worked as the Lead Systems Engineer for Automotive Safety Systems at Delco Electronics Corporation in Kokomo, Indiana. As the Lead Systems Engineer for Automotive Safety Systems at Delco, in addition to other vehicle systems, I supported the development of the techniques and concepts for the first generation Event Data Recorder ("EDR") (which was a part of the electronic module known as Sensing and Diagnostic Module ("SDM")). I was also responsible for investigating sensor issues in crash tests and field performance, including Crash Data Recording/Event Data Recording (CDR/EDR) downloads and interpretations.

During this time I also was a lead engineer in the development of crash sensor specifications and the airbag sensing systems for major OEM's worldwide. This included the development of the "Sensor Mounting Guidelines" specification provided to all OEM's who were implementing Delco Electronics safety systems.

From 1995 to 1999, I worked in the Advanced Algorithm Development Group at Delco Electronics in Kokomo, Indiana. During this time I developed algorithm design and crash sensing techniques for the new Electronic Frontal Sensor ("EFS") for frontal crash detection and also supported the development of the Frontal impact Sensor ("EFS") algorithm and signal processing designs.

I also reviewed and evaluated the methods, procedures and processes for the development of the airbag safety systems. As part of my work I designed the SDM crash sensing algorithms and CDR/EDR crash data recording logic. I also supported the development of the signal processing of input acceleration data for the next generation SDM sensor designs. I also designed a stand-alone CDR for application in field vehicles and fleet vehicles such as taxis and rental cars, as well as conducted detailed analysis of crash test data to determine sensing system design and performance. I investigated and identified sensor issues in crash testing and field performance, including many CDR/EDR downloads and interpretations. My work also included development of systems and sensors and analysis of data relating to vehicle crashworthiness.

In 1999, I also served as Senior Development Engineer for Automotive Safety Systems at Delphi Delco Electronics Systems in the Wuppertal Technical Center in Wuppertal, Germany, where I helped create an automotive safety system development group for our German engineering design center.

From 1999 to 2002, I was the Advanced Product Development Engineer at Delphi Delco Electronics Systems in Kokomo, Indiana. In addition to other projects, during this time I developed the next generation of front and frontal impact airbag sensing systems, as well as other vehicle safety systems and technologies, including crash sensing and system development for rollover roof rail airbag systems. I also obtained patent protection for six (6) crash sensing algorithms in connection with frontal and side airbag systems. I also continued to be involved in field investigations related to problems observed in system performance, including EDR/CDR downloads and interpretations. During this time, I evaluated potential airbag system defects and developed corrective actions and solutions to remedy problems that were found.

From 2002 to 2003, I worked as the Engineering Group Manager at Delphi Delco Electronics' Mexico Technical Center in Juarez, Mexico. During this time, I

managed engineering teams that developed software, systems and test engineering for Passive Occupant Detection System (PODS-B) and SDM and Satellite Sensor projects and continued my work involving vehicle systems product performance anomalies and issues, including substantial work involving downloads and interpretations.

In 2003, I was promoted to Technical Manager for Automotive Safety Systems at Delphi Corporation and continued in this role through 2006. During this time, I served as the Expert Technical Lead of all engineering disciplines (Systems, Mechanical, Electrical, Software, Test) on the development and product engineering of the PODS-B for advanced airbag systems. I also initiated the Advanced Development Project for revisions to the existing PODS-B algorithm and electronic technology. I regularly investigated and analyzed issues with the PODS and SDM systems in vehicles in the field and observed during developmental testing. In addition, a substantial part of my work involved CDR/EDR downloads and interpretations. I also provided regular training and classes in Airbag Systems and Occupant Detection Systems to engineers at Delphi and customer teams. I led the technical design review for Electronic Control Units (ECUs) and supported continuing development of the SDM and other airbag related technologies.

I voluntarily left Delphi in August of 2006. In July of 2007, I founded Automotive Safety Consulting, which provides automotive safety and technology consulting. The focus of my work with Automotive Safety Consulting involves: (1) analysis of passenger vehicle crashes and determination of the performance of the applicable safety systems; (2) identification and analysis of defects or deficiencies in occupant protection systems, if applicable; (3) research and analysis of the feasibilities and capabilities of safety system technologies and measures for preventing injuries and fatalities in a variety of field crash conditions; (4) development of protocols and support for CDR/EDR downloads; and (5) interpretation and analysis of CDR/EDR downloads.

As referenced in my CV, I have obtained six (6) patents in automotive safety technologies, 3 of which directly relate to crush zone crash sensing and all 6 of which are for products that are used in production vehicle safety systems. My work has also included two (2) publications and presentations for the Society of Automotive Engineers (SAE) International Congress involving automotive safety systems.

During the course of my work involving automotive safety systems, including my work involving SDM and Satellite crash sensing systems and analysis, I have received several awards and honors. For example, I am a recipient of the: (a) Delco Electronics Boss Kettering Award for Engineering Excellence; (b) the GM President's Council Honors Award for Engineering Excellence; (c) the Delphi Lead

Award for Advanced Engineering; (d) the GM People Make Quality Happen Award for Design Engineering Excellence; and (e) the Delphi Corporation Boron Recovery Award for Problem Solving, as well as numerous other awards and recognitions from GM, Delphi, and other OEMs.

In addition to safety consulting for various organizations needing technical information and guidance, I also provide consulting for parties in products liability cases involving automotive safety systems. I have served as a consultant for both plaintiffs and defendants in numerous cases involving automotive safety systems, including cases involving EDR/CDR downloads and readouts.

As set forth above, over the course of my years as an engineer and as a result of my background, education, training, and experience, which includes over 36 years of experience working with vehicle safety systems and over 43 years working in the automotive engineering field, I have obtained extensive knowledge regarding airbag safety technologies for frontal impact, frontal impact, rollover, rear impact occupant protection systems and devices, as well as occupant classification systems.

Background

This report addresses an incident that occurred on October 17, 2019 when Mark McCoy, driving a 2018 GMC Sierra HD ran off the left side of the roadway on an exit remap from Interstate 84, collided with two vehicles and a fence at a construction staging yard, causing significant frontal damage to the truck. The frontal impact airbag did not deploy. Mr. McCoy was seriously injured in the collision.

The scene photo below shows the truck having gone through the fence and sitting atop the flatbed trailer up against the construction truck.

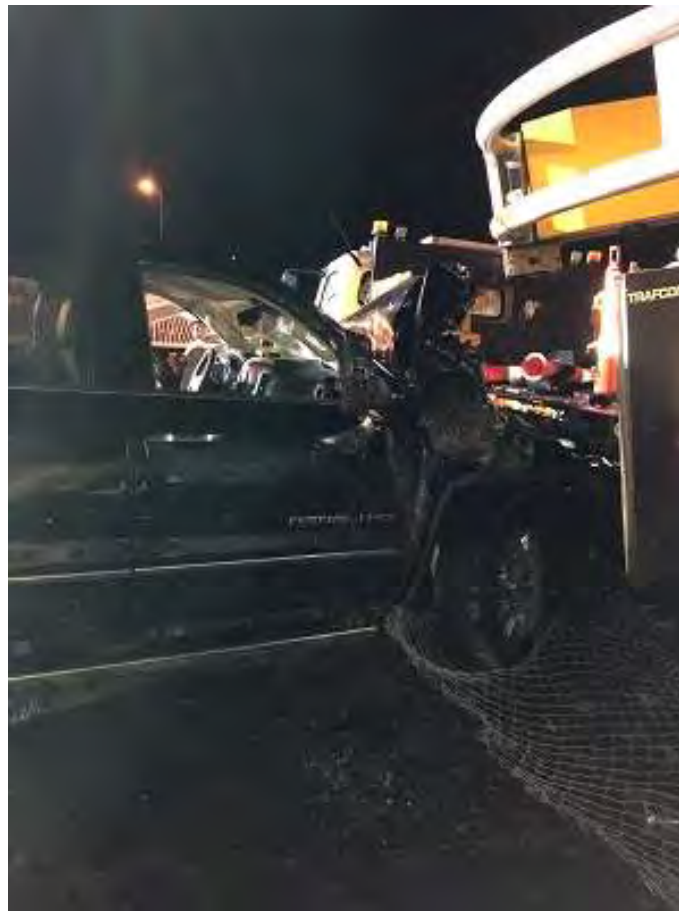


2018 GMC Sierra HD – Scene Photo

The following 2 scene photos shows the vehicle up against the axle of the construction truck.



2018 GMC Sierra HD – Scene Photo



2018 GMC Sierra HD – Scene Photo

This photo is of the post-accident subject 2018 GMC Sierra HD vehicle. Clearly there is a moderate to severe frontal impact to the front of the vehicle, which would warrant the deployment of the driver frontal impact airbag. The failure to deploy the airbag resulted in a vehicle that was defective, unsafe and unreasonably dangerous and led directly to the injuries suffered by Mr. McCoy.



2018 GMC Sierra HD – Inspection Photo

Material Reviewed:

- Connecticut Uniform Police Crash Report
- Scene Photos
- Danbury Hospital Records
- CDR Download from the Subject Vehicle
- ESIS Documents
- Inspection photos of the subject vehicle
- 2018 GMC Sierra 2500HD – Mitchell CRS Summary
- 2018 GMC Sierra 2500HD – NHTSA Ratings
- 2018 GMC Sierra 2500HD – NHTSA Recall Database
- 2018 GMC Sierra 1500 – IIHS Ratings

- GM and Aptiv (formerly Delphi) Document Production
- Exemplar Photographs

Examination:

This subject collision was a partial underride impact to the front of the subject 2018 GMC Sierra HD. Although less common for a heavy duty truck than a car, underride impacts are still foreseeable real world crash events where one vehicle rides underneath the structure of another vehicle, resulting in the primary deformation being above the bumper beam and primary vehicle structures. This results in a longer, softer crash onset, but once the upper sheet metal (grill, radiator, headlamps, etc.) deform rearward to the engine, the crash pulse can become quite severe.

In our case, the subject collision still had a significant impact into the bumper and rails from the engagement with the construction truck axle, but clearly there was an underride component since the top of the radiator is clearly pushed further rearward than the lower radiator support and bumper structures.



2018 GMC Sierra HD – Inspection Photo

Based on the documents provided by both GM and Aptiv (crash sensing system supplier), GM had a 20mph Bumper Under-ride MUST DEPLOY Barrier test requirement for the subject vehicle, however, that was never directly tested, it appears that was evaluated based on some type of computer simulated crash data:

15-K2HD-FE01.01.

Frontal Sensing Calibration Thresholds

Threshold establishment method: Barrier Test and Supplier Scaling predictions

Threshold Condition	Speed km/h (mph)	Nominal Deployment Time [ms]		Test #
		Retractor Pretensioner Driver/Pass	Front Airbag Driver/Pass	
0 Degree Frontal Thresholds				
No Deploy	14 (9)	ND	ND	C18329
All-Deploy	22 (14)	32	32	C19078
30 Degree Angle Frontal Thresholds				
All-deploy	28 (18)	33	33	15-K2HD-FE01.04 (Left)
		33	33	15-K2HD-FE01.05 (Right)
Other Frontal Sensing Conditions				
Offset Deformable Barrier	40km/h (25mph)	27	27	C18437
0 Deg Center Pole	35km/h (22mph)	46	46	15-K2HD-FE01.02
Bumper Under-ride Barrier	32km/h (20mph)	38	39	15-K2HD-FE01.01

2018 GMC Sierra HD – Calibration Thresholds

In this 20mph underride crash, the frontal impact airbags must deploy by 50ms to provide adequate occupant protection, according to the separately supplied calibration summary. In the subject crash, the estimated Delta V is approximately 30-35mph with an initial estimate of between 120-150ms time duration. This clearly is above both the standard airbag deployment threshold of 16mph rigid barrier impact as well as the 20mph underride severity. GM would have expected the frontal impact airbag, possibly a Stage 1 plus Stage 2 inflation level.

The failure to deploy the driver frontal impact in the subject collision left Mr. McCoy without any of the supplemental protection GM included in the vehicle safety system. Again, the failure to deploy this airbag was defective, unsafe and unreasonably dangerous.

The dual front EFS sensors are located on the underside of the lower radiator support of the 2018 GMC Sierra HD.

Mitchell RepairCenter™ TechAdvisor

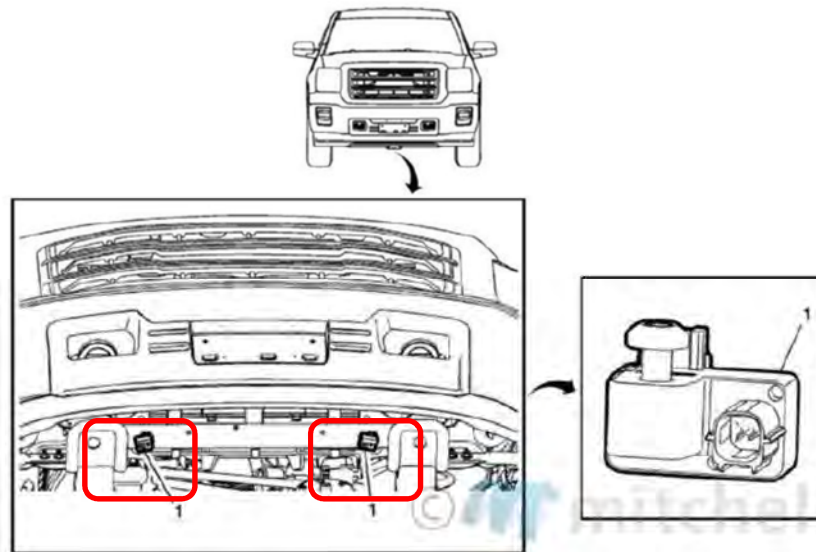
2018 GMC 2500HD Sierra Denali

Restraint Systems / Air Bag Service & Repair / Airbag / SUPPLEMENTAL INFLATABLE RESTRAINTS

Frontal Impact Sensing and Deployment (2500/3500)

Front End Inflatable Restraint Discriminating Sensor Replacement

Fig. 20: Airbag Front End Discriminating Sensor



2018 GMC Sierra HD – Mitchell Repair Center Details

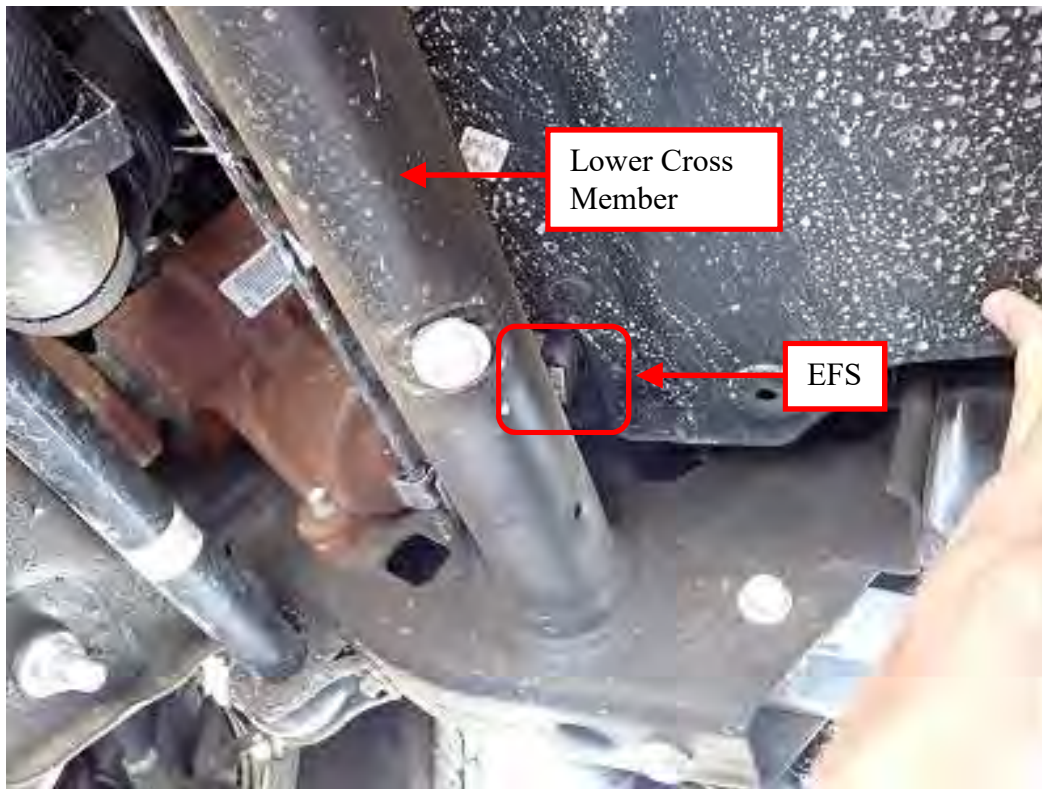
During my inspection, I noted that the EFS sensors and the entire lower radiator support were rotated rearward and upward at some point in the collision sequence.



2018 GMC Sierra HD – Inspection Photo – EFS Rotated Upward

This rotation, if it occurred early in the construction truck crash or during the trailer undercarriage impact, this would have taken the EFS sensor out of the primary frontal impact direction (they have a single axis accelerometer inside that needs to be looking forward) and with them pointed upward in the vertical direction they would no longer be seeing the fore/aft crash severity and would fail to determine that airbag deployment was necessary.

However, subsequent inspection of an exemplar by Nick Earnhart showed that these sensors were well protected by the lower frame cross member and would have been unlikely to have been impacted and rotated during the trailer impact. Thus, although this was an initial concern, the information available would make this a low probability failure mode. It cannot be ruled out, but would likely have happened late enough in the crash that the airbag should have already deployed.



2018 GMC Sierra HD Exemplar – Earnhart Inspection Photo –
EFS and Cross Member

The next key piece of forensic evidence was the fact that the Sensing and Diagnostic Module (SDM) in the subject vehicle failed to record ANY crash event.

There were 3 events in the sequence: A chain link fence, a low boy trailer and the construction truck. According to GM's own specifications, even if no airbag deployment occurs, any event greater than 8km/h (5mph) will be recorded as part of the Crash Data Recording (CDR). From the excerpt below, it is clear that no event was recorded for this subject collision even though the event was clearly above 5mph.



IMPORTANT NOTICE: Robert Bosch LLC and the manufacturers whose vehicles are accessible using the CDR System urge end users to use the latest production release of the Crash Data Retrieval system software when viewing, printing or exporting any retrieved data from within the CDR program. Using the latest version of the CDR software is the best way to ensure that retrieved data has been translated using the most current information provided by the manufacturers of the vehicles supported by this product.

CDR File Information

User Entered VIN	
User	R. Yeager
Case Number	MCCOY
EDR Data Imaging Date	08/13/2020
Crash Date	10/17/2019
Filename	ESIS AIRBAG DATA (CDR) - MCCOY () CDRX
Saved on	Thursday, August 13 2020 at 11:14:12
Imaged with CDR version	Crash Data Retrieval Tool 19.4.2
Imaged with Software Licensed to (Company Name)	ESIS - General Motors
Reported with CDR version	Crash Data Retrieval Tool 19.4.2
Reported with Software Licensed to (Company Name)	ESIS - General Motors
EDR Device Type	Airbag Control Module
Event(s) recovered	NONE

2018 GMC Sierra HD – Crash Data Recording

The failure to record any data in this collision, also clearly violates GM's own specifications for the safety system. This can generally occur in one of three ways:

1. The event does not exceed 5mph
2. The SDM was without power at the time of the collision
3. The vehicle power system was interrupted during the crash.

In the first case, we know this event was clearly above the CDR recording threshold, therefore, this would not have been a factor.

In the second case, this is more difficult to prove and also the most difficult to eliminate. The fact that we had an above threshold frontal impact but the frontal impact airbag did not deploy and the fact that we had no crash data recorded identifies this as a possible root cause of BOTH failures. The GM Ignition switch defect and subsequent recall had these types of failures, however, it was not clear if this 2018 model vehicle would have had similar issues to the known defective GM ignition switch.

The third item is common in collisions such as this. Late in the crash event, the vehicle battery and fuse block can enter the crush zone and be destroyed. My inspection of the subject vehicle shows that this was likely. However, with the SDM having an energy reserve, this would not have prevented the airbag deployment, even if it failed to complete crash recording.

Thus, if we look at the key factors here, we had a deployment level crash event but no recorded data. With this, both items 2 and 3 are feasible scenarios, but if we focus on the lack of deployment, it leaves us with 2 possibilities to consider. If the failure to deploy was because of item 2, the complete power loss BEFORE the crash, then the root cause was simply this loss of power. But we need to determine the root cause of that catastrophic power loss. If the failure to deploy was part of item 3, then we must look at the crash sensing system to determine the root cause of the failure to recognize this crash as a severe event where airbag deployment was necessary. We will focus on this next.

First let's cover the loss of power. In the SDM, there exist an energy reserve capability. What this means is that since we know loss of vehicle power is common in crash events, particularly moderate to high severity crashes will significant intrusion into the engine bay, we provide internal capacitors within the SDM to provide a limited amount of additional power so that we can continue to process the crash information, deploy airbags and pretensioners, if needed, and then to perform the crash recording function.

From the SDM30 specification (the model that was used in the subject vehicle, it was shown that the energy reserve capability varied by function. The table below shows the energy reserve minimum requirement for the various SDM functions for the reserve power, which includes deployment of airbags, providing power to external satellite sensors, crash notification services and the disposal of any non-deployed stage 2 airbag inflators:

	ENGINEERING STANDARDS	Component Technical Specification	SDM30 / ESS (Global-A)
---	----------------------------------	--	-----------------------------------

3.4.6 Energy Reserve

Table 7 provides a summary of energy reserve times for SDM functions.

Function	Minimum Energy Reserve Time
Satellite Sensors (ESS)	100 ms
All Deployment Loops (6 / 12 / 18 / 20 loops)	100 ms
Airbag Disposal function (for 2 nd or 3 rd stage)	150 ms
Automatic Crash Notification (GMLAN communication)	200 ms
Event Data Recording (EDR)	300 ms

GM Technical Specification Excerpt – SDM30

With the advent of NHTSA regulated Event Data Recording regulations in 2006, a 300ms for energy reserve is a very low number. Particularly with concatenated events and multiple rollover events, the duration of the entire crash sequence can take several seconds, and this low energy reserve value is likely to lead to failed EDR/CDR data under some foreseeable, real world crashes.

Assuming the vehicle power is lost during the 33mph impact into the construction truck, 300ms of Event Data Recording backup power should have been sufficient to complete most, if not all of the CDR data writing. Since we know the SDM30 did not record any event, then we must assume that some other factor played into the loss of power, before the system could complete writing the CDR data.

One such event could have been loss of power during the flatbed trailer impact. Interruption of battery power or an ignition key being jolted from the RUN position into the ACCessory position during this undercarriage strike. Although not common, it cannot be ruled out, as we try to understand the missing data from the SDM in a crash event clearly above the minimum 5mph requirement to dictate the writing of a crash event to memory.

Based on reconstruction estimates, if the battery or ignition feed were lost during the flatbed trailer impact, we have 200ms from onset of this event to the onset of the 120-150ms long construction truck event. Thus, based on the above table, depending on when the loss occurred, we would lose energy reserve to satellite sensors after 100ms as well as the ability to deploy airbags and pretensioners.

Thus, a catastrophic loss of power at least 100ms before the construction truck impact would prevent any deployments. A loss of power 300ms before the end of the construction truck crash would prevent both deployment as well as crash recording. There is no means available that I can envision where we could verify

the loss of power prior to or during the impact. But this could certainly be an explanation of the failure in itself.

Next we will focus on the crash sensing aspect of the possible defect. The 2018 GMC Sierra HD crash sensing system consists of the dual FCS sensors discussed above coupled with the SDM's own internal crash sensing capabilities. The crash sensing algorithm takes data from all 3 sensor locations and through a series of calculations and threshold comparisons makes severity level assessments and initiates the deployment of any necessary safety systems.

In this case, APTIV, the SDM and EFS supplier, utilizes a complex set of algorithms and rules. The Algo-Front5 system consists of dual 50G 45 degree oriented accelerometers within the SDM and 500G accelerometers in the EFS crush zone sensors. The EFS sensors send filtered acceleration data to the SDM. The SDM processes all the signals internally. Each of the devices is capable of providing both crash discrimination (Deploy and No Deploy) as well as "Safing" for the system. Safing is a safety check to insure that a deployment command is supported by at least one other sensor in the system, so that a single point sensor failure will not result in an inadvertent deployment.

The system can provide 5 levels of frontal crash severity output. The five levels, in order of crash severity are:

1. Seatbelt Pretensioner ONLY
2. Unbelted Occupant Stage 1 Airbag Deployment
3. Belted Occupant Stage 1 Airbag Deployment
4. Unbelted Occupant Stage 2 Airbag Deployment
5. Belted Occupant Stage 2 Airbag Deployment

Thus far, the SDM and crash sensing conditions are typical of the industry standards for 2018. The system is also capable of rear impact and rollover safety, but this will not be discussed here as these are not relevant to this subject collision.

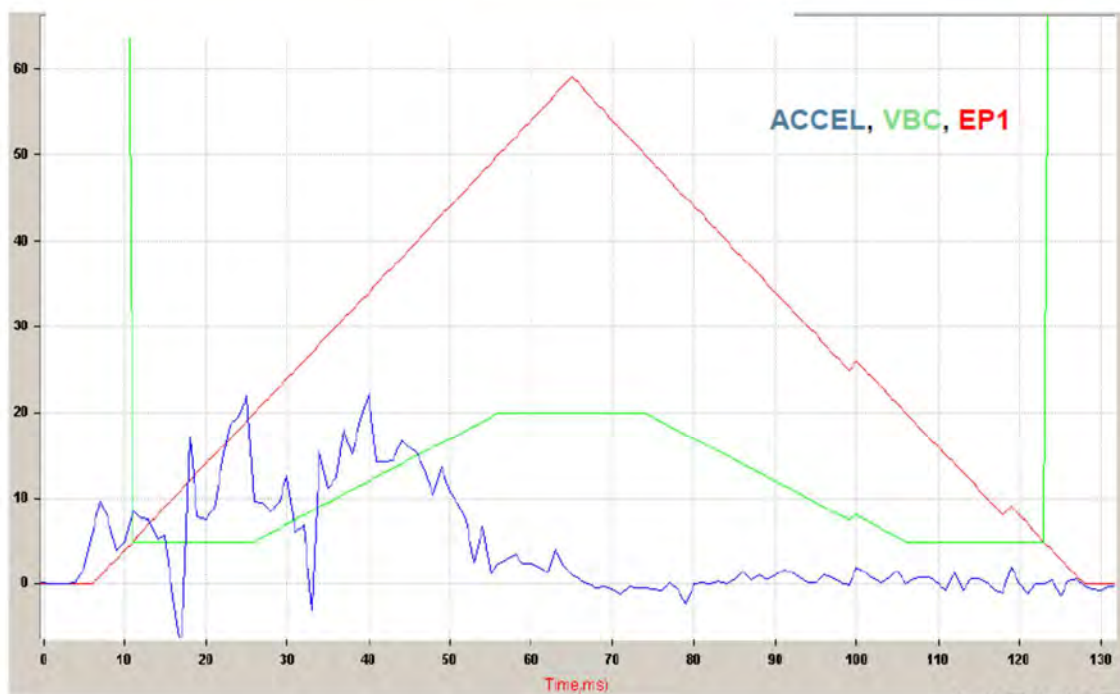
Each EFS and the SDM are capable of system "Wakeup" when any of these devices experiences an acceleration value above the wakeup or "enable" threshold. However, one concern I identified with the system is that ALL sensors must RESET before the system will reset. Thus, if any of the sensors is still awake, the entire system remains awake. This could lead to a concatenated event issue, depending on how the SDM calculations are being performed.

A concatenated event is one where multiple events happen in series, as with the subject event. Recall in our collision, we have a fence impact, followed by a

trailer impact, followed by the construction truck impact. It is imperative that the system properly parse these into 3 discrete events. By requiring all 3 sensors to reach a reset condition could lead to the overall algorithm failing to parse this into 3 separate events, thus, considering this one long event, and possibly making incorrect decisions on event severity.

Reviewing the primary part of the SDM algorithm, it is carry over from the years I was designing these systems at Delphi. Without getting into the complexities the following graph from the algorithm presentation document shows that, depending the calibration, the concatenated even performance should be reasonable for most multiple event scenarios. This chart shows that once the primary event is over, it takes time for the system to reset. During this time, the threshold is still active and if another event should occur (concatenated event) the system can process the new event and still have active thresholds, even if it does not completely reset. EP1 is the crash “clock” and you can see the red curve below increments up to about 58ms and then slowly decrements back to zero. The green deployment threshold also moves back to its original position. If you look close, the tail of the green curve is a mirror image of the beginning of the curve. This is the way the system is supposed to work.

Delphi Frontal Algorithm Algo-Front5 Event Progression 1 - 16 KPH Frontal



Delphi Confidential

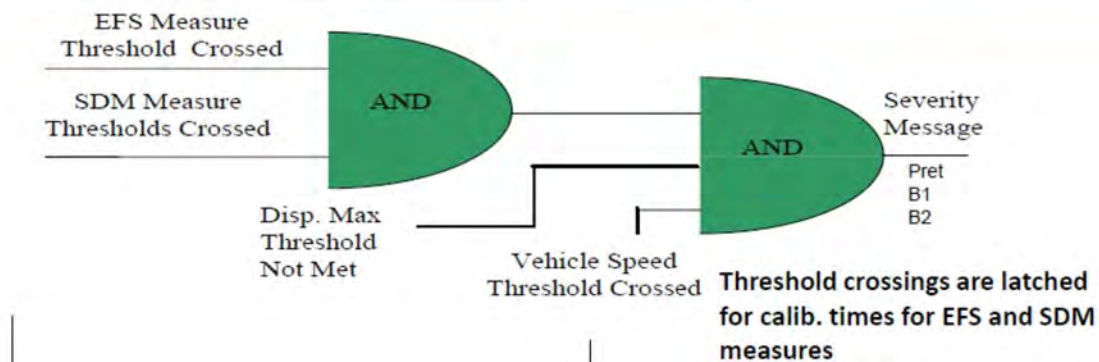
Crash Algorithm Presentation Excerpt – Threshold Performance Over Time

However, Aptiv added a new series of criteria to the algorithm. The first of which are the VSE and CVE modes. The VSE mode uses vehicle speed at time of wakeup to compare to different sets of deployment thresholds. In theory, if we know the vehicle speed at the onset of the collision, we can make an ‘educated guess’ at the potential severity, and thereby, use lower thresholds for faster deployment times.

Similarly, the CVE mode uses closing velocity at time of wakeup as a means of optimizing threshold crossings. On the surface, I have no issues with these criteria, however, what concerns me is that with these criteria active, other parts of the system calibration may be compromised on the assumption that the overall system is getting its timely deployment from this VSE mode.

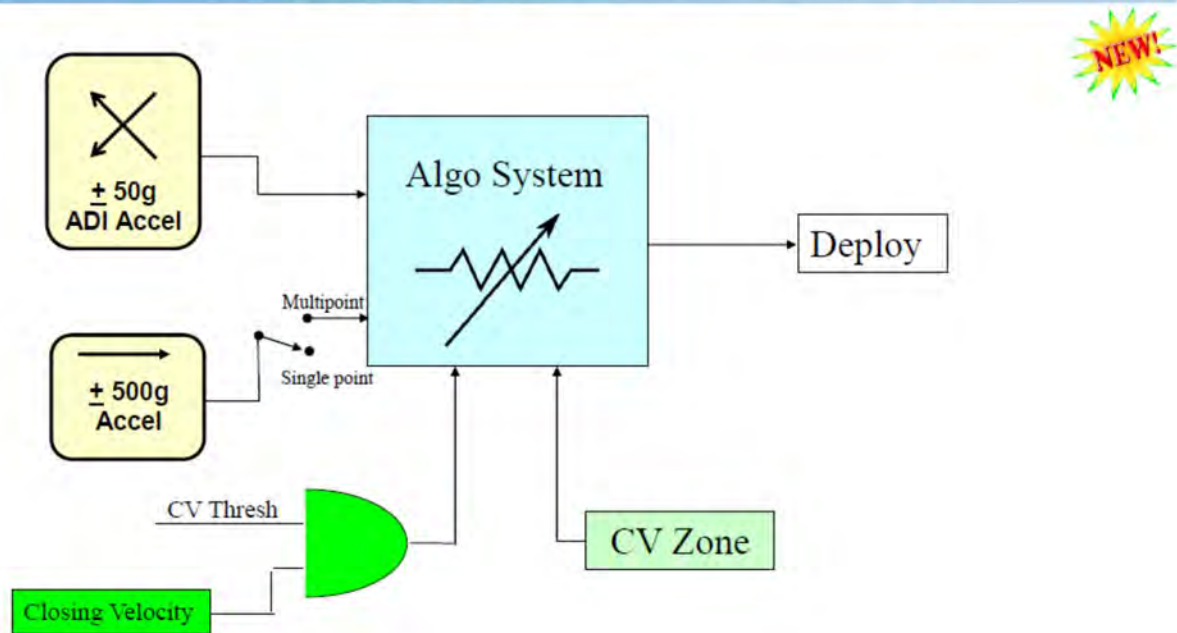
But what if the vehicle speed at wakeup does not properly represent the oncoming crash severity (head on collision – subject vehicle at 50mph, opposing vehicle at 50mph; 100mph impact speed vs 50mph vehicle speed)? What if the closing velocity at wakeup does not represent the oncoming crash severity (50mph Deer Impact, with no need for airbag deployment in most cases)? Will the rest of the algorithm be able to properly determine crash severity? Is the entire calibration providing good redundancy, should any of the firing “Modes” fail to detect the appropriate crash severity?

Delphi Frontal Algorithm Algo-Front5 Mode VSE – Vehicle Speed Enhancement



Crash Algorithm Presentation Excerpt – VSE Enhancing

Frontal Closing Velocity Enhancement (CVE)



Crash Algorithm Presentation Excerpt – CVE Enhancing

It is not clear without having crash data from the CDR to assess if either of these enhancements could have influenced the overall algorithms ability to discriminate this subject collision scenario, which was never tested in a laboratory. However, using potentially erroneous external values for closing velocity and vehicle speed prior to impact, could adversely impact the normal functionality of the crash sensing algorithm.

However, the most important thing I noted in the calibration and algorithm reviews was that although I had believed GMTG was no longer forcing the use of 45ms shutoff times in 2018 model year with the SDM30, they appeared to be using very similar shutoff times in this calibration. Looking at the production parameter files, we are looking for the calibration name that ends with “ep_end_threshold”. My recollection, although I was not able to confirm it, is that the crash sensing algorithm uses a 1.25ms time step. The calibration values are in “counts”. Thus, a 45ms STOP time would equate to $45/1.25 = 36$ counts in the calibration. Reviewing the detailed calibration file (Bates ASUS 011933- 011963) I found this range of values for this parameter:

$$12 \text{ counts} \times 1.25\text{ms/count} = 16\text{ms}$$

$$40 \text{ counts} \times 1.25\text{ms/count} = 50\text{ms}$$

Thus, it appears that GMTG is still employing very aggressive stop times. Since our subject crash had 2 key consecutive events (impact with the flatbed trailer followed by impact with construction truck) with an estimated total time duration of about 200ms from the initial impact with the trailer to the initial impact with the construction truck, these aggressive calibration “ep_end_threshold” or SHUTOFF times, could have enhanced the algorithms inability to handle the concatenation of these two events, and the deployment threshold were SHUTOFF at the time the 33mph construction truck impact occurred.

a5_cal2_mode0_1_ep_end_threshold	16
a5_cal2_mode0_1_threshold_step	20
a5_cal2_mode0_1_threshold	110
a5_cal2_mode0_2_ep_begin_threshold	11
a5_cal2_mode0_2_ep_begin_slope	14
a5_cal2_mode0_2_ep_end_slope	16
a5_cal2_mode0_2_ep_end_threshold	16
a5_cal2_mode0_2_threshold_step	20
a5_cal2_mode0_2_threshold	110
a5_cal2_mode0_3_ep_begin_threshold	27
a5_cal2_mode0_3_ep_begin_slope	27
a5_cal2_mode0_3_ep_end_slope	32
a5_cal2_mode0_3_ep_end_threshold	32
a5_cal2_mode0_3_threshold_step	0
a5_cal2_mode0_3_threshold	99999
a5_cal2_mode0_4_ep_begin_threshold	27
a5_cal2_mode0_4_ep_begin_slope	27
a5_cal2_mode0_4_ep_end_slope	32
a5_cal2_mode0_4_ep_end_threshold	32
a5_cal2_mode0_4_threshold_step	0
a5_cal2_mode0_4_threshold	99999
a5_cal2_mode1_0_ep_begin_threshold	13
a5_cal2_mode1_0_ep_begin_slope	13
a5_cal2_mode1_0_ep_end_slope	16
a5_cal2_mode1_0_ep_end_threshold	36

X2HD Truck Calibration Excerpts – EP_END_THRESHOLD examples

With earlier model GMTG truck and SUV vehicles, I have had numerous failure to deploy cases where the root cause was determined to be the 45ms SHUTOFF criteria. In this case, the shutoff time varies based on the deployment mode of the algorithm but as stated above, they range from 16ms to 50ms. If the crash sensing algorithm is unable to reset during this gap between the onset of the trailer impact and the onset of the construction truck impact, the shutoff times will prevent the algorithm from deploying when the 33mph construction truck impact occurs.

The principles identified in their crash sensing algorithm and calibration strategy, including ‘safing’ are consistent with other systems that I have designed

and evaluated. However, although the design appears logical, the fact that the driver frontal impact airbag fails to deploy in a crash that is well above the airbag deployment threshold established by GMTG, clearly shows the GMTG implementation on the subject 2018 GMC Sierra HD is defective, unsafe and unreasonably dangerous.

The following would be alternative designs that existed in 2018 Model Year that GM could have employed in the 2018 GMC Sierra HD Frontal impact Safety System:

1. Modify the algorithm calibrations with more robust 120-150ms ep_end_threshold values.
2. Provide a larger energy reserve capability than 300ms, to insure that not only can airbags be deployed, but that crash recording can be completed.

Ultimately, the defective design and calibration of the frontal impact crash sensing system resulted in the failure to deploy the impacted driver frontal impact airbag in the subject crash. This condition was defective, unsafe and unreasonably dangerous to the vehicle occupants Mr. McCoy

Opinions:

Based on the review of all the available information, a detailed review of the photos, available technical information, alternative designs and based on my years of experience designing, developing crash sensors and occupant safety systems, it is possible to formulate the following conclusions and opinions regarding the performance of the frontal impact airbag system in the subject 2018 GMC Sierra HD. I have formed these opinions utilizing the methodology which is accepted in the automotive safety system design and performance evaluation segments of the occupant restraint system industry.

The opinions rendered in this report are based on my knowledge, education, training, and experience, and are stated to a reasonable degree of engineering and scientific certainty. These opinions are based upon my review and analysis of the materials available as of the date of this report. I reserve the right to supplement or change the opinions expressed in this preliminary report based upon review of new materials or additional pertinent information, analyses or documentation received in the future:

- The vehicle crush conditions and severity of the subject collision were such

that the Driver Frontal Impact Airbag in the 2018 GMC Sierra HD should have deployed. This failure to deploy this airbags resulted in a condition that was defective, unsafe and unreasonably dangerous to the driver in this vehicle.

- Safer alternative designs existed, as set forth in the body of this report and they consisted of properly calibrated frontal impact crash sensors for the frontal impact restraint system that could have been employed in the 2018 GMC Sierra HD at the time that the vehicle left the control of General Motors Corporation. The failure to use a robust calibration resulted in system that was defective, unsafe and unreasonably dangerous to the occupant in this vehicle.
- The safer alternative designs would not have impaired the utility of the occupant restraint system in other testing or real world conditions if properly developed and employed in the 2018 GMC Sierra HD.
- The safer designs were both economically and technologically feasible at the time that the occupant restraint system left the control of General Motors Corporation.
- There were no known material alterations to the occupant restraint system and the subject vehicle after it left possession of the manufacturer which would have affected the performance of the system.

These opinions are based on all data which was available at the time of this report. Additional data provided as a result of detailed document discovery and production, at a later date could result in a refinement in the opinions and conclusions generated in this document. I also reserve the right to make additional observations and opinions and/or to modify observations and opinions based upon the review of the opinions of other experts.



Chris Caruso

(CV Provided Upon Request)

EXHIBIT E

Richard Heimann (CA State Bar # 063607)
Nimish R. Desai (CA State Bar # 244953)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery St., 29th Fl
San Francisco, CA 94111-3339
Telephone: 415-956-1000
Facsimile: 415-956-1008
rheimann@lchb.com
ndesai@lchb.com

David S. Stellings (*pro hac vice*)
Katherine I. McBride (*pro hac vice*)
Jessica A. Moldovan (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: 212.355.9500
Facsimile: 212.355.9592
dstellings@lchb.com
kmcbride@lchb.com
jmoldovan@lchb.com

Attorneys for Plaintiffs

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

James Milstead, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC, et al.,

Defendant.

Case No. 4:21-cv-06338-JST

~~SECOND~~THIRD AMENDED CLASS
ACTION COMPLAINT

JURY TRIAL DEMANDED

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. PARTIES	4
A. Plaintiffs	4
B. Defendants.....	6
III. JURISDICTION, VENUE, AND INTRADISTRICT ASSIGNMENT	7
IV. GENERAL FACTUAL ALLEGATIONS	~~7~~ <u>8</u>
A. SDMs are supposed to detect crashes and control airbags and seatbelts.	~~7~~ <u>8</u>
B. GM used a dangerous and defective SDM software calibration in its trucks and SUVs.	~~10~~ <u>11</u>
C. GM knew that the SDM Calibration Defect was dangerous and unjustified but has failed to warn or compensate consumers.....	~~13~~ <u>14</u>
1. Old GM recklessly downplayed serious risks of injury when it chose to include the SDM Calibration Defect in the Class Vehicles....	~~15~~ <u>16</u>
2. ~~The 45-millisecond~~ <u>GM's aggressive</u> cutoff was not necessary to protect against "late" airbag deployments.....	~~18~~ <u>20</u>
3. GM knew about a pattern of suspicious accidents involving the SDM Calibration Defect in the Class Vehicles.....	~~21~~ <u>22</u>
a. GM has litigated (and settled) many personal injury lawsuits for suspicious airbag failures in the Class Vehicles.....	~~22~~ <u>23</u>
b. GM knew or should have known about hundreds of publicly reported airbag failures in the Class Vehicles.....	~~30~~ <u>32</u>
D. Despite its knowledge, GM misrepresented and concealed important information about the SDM Calibration Defect and Class Vehicle safety.	~~48~~ <u>50</u>
1. Labels and window stickers on the Class Vehicles stated that they were equipped with working airbags and seatbelts and failed to disclose the SDM Calibration Defect.....	~~49~~ <u>51</u>
2. GM published owners' manuals for the Class Vehicles that detailed their safety features but did not disclose the SDM Calibration Defect.	~~52~~ <u>54</u>
3. GM marketed the Class Vehicles to be safe and reliable but failed to mention the SDM Calibration Defect.	~~56~~ <u>58</u>
4. GM provided warranties to repair defects in the Class Vehicles and have not done so.....	~~59~~ <u>61</u>
V. CLASS ACTION ALLEGATIONS	~~60~~ <u>62</u>
A. The Class Definition	~~60~~ <u>62</u>
B. Numerosity: Federal Rule of Civil Procedure 23(a)(1).....	~~61~~ <u>63</u>
C. Commonality and Predominance: Federal Rule of Civil Procedure 23(a)(2) and 23(b)(3).....	~~62~~ <u>64</u>
D. Typicality: Federal Rule of Civil Procedure 23(a)(3).....	~~63~~ <u>65</u>
E. Adequacy: Federal Rule of Civil Procedure 23(a)(4).....	~~63~~ <u>65</u>

TABLE OF CONTENTS
(continued)

		Page
	F. Declaratory and Injunctive Relief: Federal Rule of Civil Procedure 23(b)(2) ..	~~64~~ <u>65</u>
	G. Superiority: Federal Rule of Civil Procedure 23(b)(3)	~~64~~ <u>66</u>
VI.	ANY APPLICABLE STATUTES OF LIMITATION ARE TOLLED	~~64~~ <u>66</u>
VII.	CAUSES OF ACTION	~~66~~ <u>68</u>
VIII.	PRAYER FOR RELIEF	~~81~~ <u>80</u>
IX.	DEMAND FOR JURY TRIAL	~~82~~ <u>81</u>

1 Plaintiffs, individually and on behalf of all others similarly situated (the “Class”), allege
 2 the following against General Motors LLC, General Motors Holdings LLC, and General Motors
 3 Company (collectively, “Defendants,” “GM,” or “New GM”) based, where applicable, on
 4 personal knowledge, information and belief, and the investigation of counsel and their experts.
 5 Plaintiffs file this complaint pursuant to the Court’s Order granting leave (Dkt. ~~177 at 25~~, 196 at
 6 19) and attach hereto as Exhibit E a redline comparison between this complaint and the previous
 7 pleading for the Court’s reference.

8 **I. INTRODUCTION**

9 1. This case involves a dangerous defect that compromises critical safety systems in
 10 millions of GM trucks and SUVs. When working properly, during a frontal crash of sufficient
 11 severity, a vehicle’s seatbelts should tighten to hold the vehicle occupants in place, and the
 12 airbags should inflate to protect them from hard impacts. A defect in the Class Vehicles, however,
 13 can prevent seatbelt tightening and airbag deployment during certain types of crashes, leaving
 14 vehicle occupants without protection exactly when they need it most.¹

15 2. The defect is contained in the software that governs the Class Vehicles’ airbag
 16 control unit. This unit, also known as the Sending and Diagnostic Module (“SDM”), is a small
 17 computer connected to sensors placed throughout a vehicle. These sensors monitor vehicle
 18 performance and tell the SDM when they detect irregular behavior.

19 3. Based on the signals it receives from these sensors, the SDM *should* fire the
 20 airbags and tighten seatbelts when needed in a real-world crash of sufficient severity. But in the
 21 Class Vehicles, the software program that controls the SDM is calibrated in such a way that it
 22 prematurely prevents airbag and seatbelt deployment ~~just 45 milliseconds after a crash has begun,~~
 23 long before any reasonable or acceptable time to do so. This has serious repercussions in
 24 foreseeable, real-world accidents that need seatbelt and airbag deployment after ~~45~~
 25 ~~milliseconds—such~~ the software cuts off access to those features—such as accidents that involve
 26

27 ¹ The “Class Vehicles” include all vehicles in the United States that contain the SDM Calibration
 28 Defect that were (1) manufactured, sold, distributed, or leased by Defendants or (2)
 manufactured, sold, distributed, or leased by General Motors Corporation (“Old GM”) and
 purchased or leased by Plaintiffs or a Class member after July 10, 2009.

multiple impacts, or that start with a soft initial onset and then increase in severity over time. In such accidents, ~~before the SDM has reset—in which~~ the airbags and seatbelts in the Class Vehicles can fail. Put simply, ~~GM decided to install a~~ because of a persistent, dangerous insistence within the company's Trucks Group, GM used a software calibration that can and does prematurely close the time window to engage airbags and seatbelts in a crash, putting occupants of the Class Vehicles ~~in at~~ serious ~~danger~~ risk.

4. Old GM knew about the effect of this calibration and related dangers from the very outset, when it originally decided to prematurely close the time window for airbag deployment in the Class Vehicles in the late 1990s.² In the process, Old GM overrode serious concerns from a team from Delco Electronics (later called Delphi Electronics, now known as Aptiv), including engineering manager, Chris Caruso. Mr. Caruso and a team of software engineers from Delco—which designed the base SDM software program used in the Class Vehicles and other GM vehicles—expressly warned Old GM in or about 1999 that ~~preventing using its strategy to~~ prematurely cut off the potential for airbag and seatbelt deployment ~~after 45 milliseconds during a~~ crash event was a reckless and dangerous design decision.

5. Old GM's ~~trucks group~~ Trucks Group, which was in charge of the design and development for all GM trucks and SUVs, ignored this warning and insisted on using its defective SDM calibration strategy ~~to shut off the ability to deploy airbags and seatbelts after 45~~ milliseconds (the "SDM Calibration Defect"). Given their significant concerns, Mr. Caruso and the Delco team insisted that Old GM sign a disclaimer of Delco's liability for the modified algorithm as used in GM trucks and SUVs.

6. Tellingly, a separate team in charge of the design and development for GM cars rejected GM Trucks' approach after hearing (and heeding) the Delco team's concerns about the earlier cutoff. As such, GM cars included a much longer window (~~at least two to three times longer than~~ fully twice as long as the window used by GM Trucks, approximately 100-~~150~~ at minimum) for the airbags and seatbelts to deploy in a crash for the vehicles they

² As detailed further below, Old GM filed for bankruptcy in 2009, which led to the creation of the contemporary GM entities named as Defendants herein.

designed. As such, not only did GM Trucks reject the warnings from Mr. Caruso and the Delco team, it also ignored ~~the~~ its own cars group's views, which included a time window that more reasonably and appropriately tracks the duration of crash events in the real world, as opposed to the laboratory crash test environment.

7. On information and belief, starting in or about 1999, GM Trucks Group (and Old GM before it) ~~installed the~~ used its defective approach to SDM software calibration in all of the ~~Class Vehicles~~ trucks and SUVs (mid and large size vehicles) under its direction, and continued to use its dangerous and defective approach to prematurely cut off airbag and seatbelt deployment during crashes at least through model year 2018. Plaintiffs refer to this defective strategy—to calibrate software to prevent airbag and seatbelt deployment during a “dead zone” that begins too soon after a crash has begun, and well before the safer window used by GM cars (a minimum of approximately 100 milliseconds after a crash has begun)—as the “SDM Calibration Defect.”

8. ~~7.~~ When General Motors, LLC (“GM LLC”) was formed in 2009, it acquired books, records, and personnel from Old GM that reflected this reckless decision to use the dangerous SDM calibration in GM trucks and SUVs. Despite this acquired knowledge, GM continued to use Delco SDMs in its vehicles and, on information and belief, continued to use the defective software calibration associated with those Delco SDMs as well.

9. ~~8.~~ Since it was formed in 2009, GM has gained still more knowledge of the defect through personal injury lawsuits, consumer complaints, and its own investigations into serious crashes where the airbags and seatbelts failed in the Class Vehicles. As an example, documents in a personal injury lawsuit filed against GM LLC in 2011 describe the SDM Calibration Defect in detail and relate Old GM's reckless decision to use it. See § IV.C.3.a, *infra*. Chris Caruso, the engineer who originally objected to the defective ~~algorithm~~ deployment strategy in the first instance, has gone on to serve as an expert in a number of these cases.

10. ~~9.~~ While the use of the defective shutoff strategy began some twenty years ago, it remains a real and immediate risk to Plaintiffs and Class members today. ~~Indeed, Indeed—and while personal injury settlements are not uniformly made public (such that the records available to Plaintiffs only reflect those publicly disclosed)—~~ court records show that GM settled yet

another personal injury lawsuit about ~~this SDM calibration defect just last month,~~ the SDM Calibration Defect in December 2022.

11. Discovery in that case-, McCoy v. General Motors, revealed ~~the defect was included that~~ GM persisted in using its dangerous, early cutoff strategy in a model year 2018 GM SUV. ~~This is~~ Mr. Caruso's report in McCoy provides direct evidence that ~~GM Trucks continued to use the,~~ after first insisting on its defective deployment cutoff strategy in ~~its vehicles~~ approximately 1999, for many years (decades) ~~after its introduction in approximately 1999~~ thereafter up to 2018, GM Trucks failed to adopt a safer and more rational design that would allow for deployment for at least as long as the window used by GM cars (i.e., approximately 100 milliseconds at a minimum). See § IV.C.3.a, *infra*. To the contrary, in both 1999 and 2018, GM's trucks and SUVs dangerously cut off the deployment window far short of that minimum.

12. ~~10.~~ Finally, publicly available consumer complaints to the National Highway Traffic and Safety Administration ("NHTSA") detail more than **eight hundred** instances where the airbags and/or seatbelts suspiciously failed in the Class Vehicles during frontal crashes. Many of these reports specifically state that GM knew about and investigated the crash after the reported airbag failures. A separate NHTSA dataset indicates that, from 1999 to 2021, at least 1,298 people were killed or injured in a frontal collision in which the airbags did not deploy in one of these vehicles. See IV.C.3.b, *infra*.

13. ~~11.~~ Despite its knowledge of the ~~defect~~ SDM Calibration Defect and its impact on safety, GM has concealed the defect and failed to recall or repair the Class Vehicles, and has thereby avoided the significant costs, inconveniences, and reputational harms of recalling millions of trucks and SUVs. GM has hidden the ~~Defect~~ defect despite its obligation to disclose it, misrepresented the Class Vehicles to be safe, and continued to sell them to consumers.

14. ~~12.~~ Because of GM's failure to disclose the truth, consumers continue to purchase and drive Class Vehicles with the SDM Calibration Defect every day—on road trips, commutes, and weekend errands alike—unaware that their airbags and seatbelts may not work in certain serious crashes when they need them. This lawsuit seeks redress from GM for the damages

1 incurred when Plaintiffs and proposed Class members paid for vehicles with a safety system that
2 may fail them in life-threatening collisions.

3 **II. PARTIES**

4 **A. Plaintiffs**

5 15. Plaintiff James Milstead (“Plaintiff” for the purposes of this paragraph) is an
6 individual residing in Oxnard, CA. On September 11, 2021, Plaintiff purchased a 2012 Avalanche
7 (for purposes of Plaintiff’s allegations, the “Class Vehicle”) from Escondido Auto Super Center
8 in Escondido, CA. On information and belief for the reasons set forth herein, GM installed the
9 SDM ~~calibration defect—which~~ Calibration Defect—which shut off the vehicle’s ability to
10 deploy airbags in a crash ~~after 45 milliseconds—in~~ prematurely—in Mr. Milstead’s truck during
11 the manufacturing process, and Mr. Milstead’s truck contained the SDM ~~calibration defect~~
12 Calibration Defect at the time he purchased the vehicle. At the time of purchase, Plaintiff
13 reasonably expected that the airbags and seatbelts would function in the event of a crash and had
14 no way of knowing that it contained a dangerous and defective SDM calibration that could cause
15 the airbags and seatbelts to fail when needed during a crash. To the contrary, before acquiring the
16 vehicle, Plaintiff viewed or heard commercials and reviews through television, radio, and the
17 internet that touted the safety and reliability of Plaintiff’s vehicle and GM vehicles generally. GM
18 concealed the existence of the defective SDM calibration from consumers including Plaintiff.
19 Plaintiff would not have purchased the Class Vehicle, or would have paid less for it, if
20 Defendants did not conceal material information about the defective SDM calibration.

21 16. Plaintiff Arthur Ray (“Plaintiff” for the purposes of this paragraph) is an individual
22 residing in Brentwood, California. In or around January 22, 2010, Plaintiff purchased a new 2010
23 GMC Sierra 2500 (for purposes of Plaintiff’s allegations, the “Class Vehicle”) from Concord
24 GMC, an authorized dealership located in Concord, California. On information and belief for the
25 reasons set forth herein, GM installed the SDM Calibration Defect—which shut off the vehicle’s
26 ability to deploy airbags in a crash ~~after 45 milliseconds—in~~ prematurely—in Mr. Ray’s truck
27 during the manufacturing process, and Mr. Ray’s truck contained the SDM Calibration Defect at
28 the time he purchased the vehicle. At the time of purchase, Plaintiff reasonably expected that the

1 vehicle's airbags and seatbelts would function in the event of a crash and had no way of knowing
 2 that it contained a dangerous and defective SDM calibration that could cause the airbags and
 3 seatbelts to fail when needed during a crash. To the contrary, before acquiring the Vehicle,
 4 Plaintiff viewed or heard commercials and reviews through television and the internet that touted
 5 the safety and reliability of Plaintiff's vehicle, including its "Five Star" safety rating, and GM
 6 vehicles generally. GM concealed the existence of the defective SDM calibration from consumers
 7 including Plaintiff. Plaintiff would not have purchased the Class Vehicle, or would have paid less
 8 for it, if Defendants did not conceal material information about the defective SDM calibration.

9 17. Plaintiff Richard Vargas ("Plaintiff" for the purposes of this paragraph) is an
 10 individual residing in Menifee, California. In or around December 2012, Plaintiff purchased a
 11 new 2012 Chevrolet Suburban (for purposes of Plaintiff's allegations, the "Class Vehicle") from
 12 El Camino Real Chevrolet dealership located in Monterey Park, California. On information and
 13 belief for the reasons set forth herein, GM installed the SDM Calibration Defect—which shut off
 14 the vehicle's ability to deploy airbags in a crash ~~after 45 milliseconds—in~~ prematurely—in Mr.
 15 Vargas' SUV during the manufacturing process, and Mr. Vargas' SUV contained the SDM
 16 Calibration Defect at the time he purchased the vehicle. At the time of purchase, Plaintiff
 17 reasonably expected that the Vehicles' airbags and seatbelts would function in the event of a
 18 crash and had no way of knowing that it contained a dangerous and defective SDM calibration
 19 that could cause the airbags and seatbelts to fail when needed during a crash. To the contrary,
 20 before acquiring the Vehicle, Plaintiff viewed or heard commercials and reviews through
 21 television, radio, and the internet that touted the safety and reliability of Plaintiff's vehicle,
 22 including its "Five Star" safety rating, and GM vehicles generally. Additionally, when at the
 23 dealership before making his purchase, Plaintiff inquired about the airbags in the Class Vehicle.
 24 GM concealed the existence of the defective SDM calibration from consumers including Plaintiff.
 25 Plaintiff would not have purchased the Class Vehicle, or would have paid less for it, if
 26 Defendants did not conceal material information about the defective SDM calibration.

1 **B. Defendants**

2 18. General Motors LLC (“GM LLC”) is a Delaware limited liability company with its
3 principal place of business located at 300 Renaissance Center, Detroit, Michigan, and is a citizen
4 of the States of Delaware and Michigan. The sole member and owner of GM LLC is General
5 Motors Holdings LLC.

6 19. General Motors Holdings LLC (“GM Holdings”) is a Delaware limited liability
7 company with its principal place of business in Detroit, Michigan, and is a citizen of the States of
8 Delaware and Michigan. The sole member and owner of GM Holdings is General Motors
9 Company.

10 20. General Motors Company (“GM Parent”) is a Delaware corporation with its
11 principal place of business in Detroit, Michigan, and is a citizen of the States of Delaware and
12 Michigan. GM Parent’s only asset is its 100% ownership interest in GM Holdings. In public SEC
13 filings, GM Parent states: “We design, build and sell cars, trucks, crossovers and automobile parts
14 worldwide.” GM Parent sells vehicles throughout the United States “through [its] dealer network
15 to retail customers.” As further noted in SEC filings, GM Parent is also responsible for making
16 reports to NHTSA related to vehicle safety and making determinations as to vehicle recalls.³

17 21. Each of GM LLC, GM Holdings, and GM Parent operates out of GM’s Global
18 Headquarters in Detroit, Michigan.

19 22. In June 2009, Old GM filed for bankruptcy. Defendants were then created on or
20 about July 10, 2009, in connection with the sale of substantially all of Old GM’s assets pursuant
21 to a Master Sale and Purchase Agreement. As a result of the sale, GM LLC acquired substantially
22 all of Old GM’s books, records, and personnel. GM LLC then transferred some of these assets to
23 GM Holdings (formed shortly after the bankruptcy sale). Defendants thereby acquired from Old
24 GM the knowledge about the SDM Calibration Defect (defined below) that those books, records,
25 and personnel held. GM Parent and GM LLC also took responsibility for any necessary recalls of
26 Old GM vehicles going forward.

27
28 ³ See General Motors Company’s Form 10-K for fiscal year 2019.

23. The causes of action in this Complaint are directed to GM Parent, GM Holdings, and GM LLC and are based on their misconduct.

III. JURISDICTION, VENUE, AND INTRADISTRICT ASSIGNMENT

24. This Court has original jurisdiction over this action pursuant to the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1332(d), because at least one Class member is of diverse citizenship from one Defendant, there are more than 100 Class members, and the aggregate amount in controversy exceeds \$5 million, exclusive of interest and costs.

25. This Court has personal jurisdiction over Defendants under California Code of Civil Procedure section 410.10.

26. Venue is proper in this District under 28 U.S.C. § 1391, and assignment is proper to this division under N.D. Cal. L.R. 3-2, because a substantial part of the events or omissions which give rise to the claims occurred in this District, and because Defendants have caused harm to Class members residing in this District, including Plaintiff Ray. GM conducts substantial business, including through numerous dealerships, and marketed, advertised, sold, and leased Class Vehicle in this District.

IV. GENERAL FACTUAL ALLEGATIONS

A. SDMs are supposed to detect crashes and control airbags and seatbelts.

27. Car crashes kill or seriously injure hundreds of thousands of people every year. Because of this risk, the federal government requires automobile manufacturers to include critical safety features—seatbelts and airbags—in all vehicles sold in the United States. This life-saving equipment has been mandatory in passenger vehicles since 1997. *See* 49 U.S.C. § 30127.

28. These features include seatbelt pretensioners, which tighten seatbelts to secure the occupants, and airbags, which are cushions that rapidly inflate from the steering wheel and other areas of the vehicle. During an accident, seatbelt pretensioners hold vehicle occupants in place, and airbags buffer or prevent impact between occupants and hard structures in the vehicle. Without the airbags, slamming into the hard structures (such as the steering wheel) during a crash can and has caused serious injuries and death.

29. When functioning properly, the combination of seatbelts and airbags is highly effective in reducing the safety risk in automobile collisions. NHTSA reports that the use of seatbelts and airbags reduces fatality risk by **61 percent** compared to an unbelted occupant in a vehicle without airbags.⁴ From 1987 to 2017, an estimated 50,457 lives were saved because frontal airbags deployed during a crash.⁵

30. Although airbags work effectively to protect occupants when necessary, they are not meant to deploy with every impact. A crash may be of lower intensity (e.g., a low-speed fender bender in a parking lot) such that the seatbelt alone will be sufficient protection for the occupant.⁶ Airbags are designed to deploy in “moderate to severe” frontal or near-frontal crashes. A “moderate to severe” frontal crash is the equivalent of hitting a solid, fixed barrier at 8-14 miles per hour or higher.⁷

31. Seatbelt and airbag systems are known as “passive” safety systems because, when they are needed, they are supposed to operate automatically (meaning, the driver does not need to hit a button to deploy the airbag). They use sophisticated hardware components and software to activate and deploy the seatbelts and airbags systems automatically.

32. The “brain” behind this operation is the airbag control unit or “ACU” (also known as an Electronic Control Unit or “ECU”). GM refers to this component as the “Sensing and Diagnostic Module” or “SDM,” and that term is used throughout this Complaint. SDMs are effectively computers that control the car’s safety systems. They are intended, where appropriate, to issue a “command” to deploy airbags and tighten seatbelts to prevent or mitigate injury to vehicle occupants in a crash.

33. The SDM operates in three basic phases:

a. *First*, during regular vehicle operation, the SDM sits in a resting or “normal” mode. In this mode, the SDM constantly receives signals from sensors placed

⁴ U.S. Department of Transportation, NHTSA, *Fatalities in Frontal Crashes Despite Seat Belts and Airbags*, NHTSA Technical Report No. DOT HS 811 202 (September 2009).

⁵ NHTSA, Air Bags Overview. Available at: <https://www.nhtsa.gov/equipment/air-bags> (last visited ~~January 26~~ July 27, 2023).

⁶ Dr. Ching-Yao Chan, *Fundamentals of Crash Sensing in Automotive Airbag Systems*. Copyright Society of Automotive Engineers, (2000), at p. 50.

⁷ Air Bags Overview, *supra* note 5.

1 throughout the vehicle, which collect and report information on inputs such as acceleration, wheel
 2 speed, brake pressure, and impacts.⁸ The SDM monitors and interprets these signals to determine
 3 whether the vehicle is involved (or about to be involved) in a crash.

4 b. *Second*, while monitoring these signals in “normal” mode, if and when the
 5 SDM detects an irregular input that suggests a potential crash, it “wakes up” to search for further
 6 confirmation of a crash (as opposed to, for example, an irregular input from slamming on the
 7 brakes and then avoiding a collision). In this second stage—known as “wake up” or “standby”
 8 mode—the SDM’s crash-sensing software algorithm is engaged to quickly decipher crash status
 9 and respond.⁹ After “wake up” mode is triggered by an irregular input, if additional inputs
 10 confirm a moderate to severe frontal crash, the SDM *should* issue a command to “fire” the airbag
 11 and/or tighten the seatbelts as needed.¹⁰

12 c. *Third*, the final phase in this sequence is the “reset” phase. From “wake up”
 13 mode, after it detects that a crash or a potential crash has fully completed, (i.e., that the vehicle
 14 has returned to normal operation after an irregular input) the SDM ultimately returns to its normal
 15 operating state through “resetting.”

16 34. A vehicle striking a pothole illustrates this three-phase sequence. The vehicle first
 17 operates with the SDM in “normal” mode as it drives down the road. Then, suddenly, the driver
 18 hits an unseen pothole. This jolt from hitting the pothole (and/or related inputs like deceleration)
 19 will trigger the SDM to enter “wake up” mode where it searches for more inputs. Awake, the
 20 SDM quickly asks: “How fast is the vehicle slowing down? Is the front bumper crushed? Is the
 21 vehicle speeding back up normally?” and reacting in turn.¹¹

24 ⁸ Clemson University Vehicular Electronics Laboratory, “Airbag Deployment Systems.”
 25 Available at: https://cecas.clemson.edu/cvel/auto/systems/airbag_deployment.html (last visited
 26 ~~January 26~~ July 27, 2023).

26 ⁹ John Pearley Huffman, “The Physics of Airbags,” *Car & Driver*, June 14, 2011. Available at:
 27 <https://www.caranddriver.com/features/a15121591/the-physics-of-airbags-feature> (last visited
 28 ~~January 26~~ July 27, 2023).

27 ¹⁰ Jesse Kendall, P.E., and Kenneth Solomon, Ph.D., “Airbag Deployment Criteria” at p. 11.
 28 Available at: <https://www.experts.com/content/articles/Kenneth-Solomon-Airbag-Paper.pdf> (last
 visited ~~January 26~~ July 27, 2023).

¹¹ Solomon, *supra* note 10, at p. 11.

35. If the SDM senses that the vehicle returns to normal operation and continues down the road, it will stop looking for confirmation of a crash and reset to normal operation. On the other hand, if, after it hits the pothole, the vehicle veers out of its lane and crashes into another vehicle head on, the SDM should detect this second input and fire the airbag.¹²

36. This entire sequence—from sensing an irregular signal (the pothole), to waking up and searching for confirmation of a crash, to firing the airbag where needed—might take only fractions of a second. ~~Indeed, a typical “crash duration” in a frontal, vehicle-to-barrier collision lasts for approximately 80-150 milliseconds (0.08-0.15 seconds).~~¹³ For that reason, timing this sequence properly is critically important to ensure that the seatbelts are tightened, and the airbags deploy, to protect the occupants when they need to.

B. GM used a dangerous and defective SDM software calibration in its trucks and SUVs.

37. Throughout the three-phase sequence described above, SDMs rely on software algorithms to interpret signals, estimate crash dynamics, and issue a “deploy” or “do not deploy” command to the safety systems.

38. For the SDM to function as intended, the software that controls it must be designed to recognize and respond to real-world crashes so that the airbags inflate and seatbelts tighten when they are needed.

^{39.} ~~2.~~ Crash sensing occurs in “real-time.” This means that the sensing algorithm can only examine a limited window of data to predict and judge the severity of crash events before conclusion, so that the airbags can deploy and protect the occupant on impact.¹⁴¹³ A decision to “deploy” the airbags should occur when certain pre-set thresholds that tell the SDM a crash is severe enough (i.e., a moderate to severe frontal collision) are met or exceeded. These deployment thresholds are programmed into the SDM software through a process in which engineers “calibrate” the software algorithm in the vehicle.

¹² *Id.* at p. 8.

¹³ ~~Chan, *supra* note 6, at p. 169.~~

¹⁴¹³ Chan, *supra* note 6, at p. 95.

40. ~~3.~~In the Class Vehicles, the software calibration that controls how and when the SDM detects accidents and deploys the safety systems contains a serious defect ~~(the “SDM Calibration Defect”).~~ Specifically, for frontal crashes, GM calibrated the SDM to prevent deployment ~~of airbags and pretensioners more than 45 milliseconds after it enters “wake-up” mode.~~¹⁵ ~~GM did this by increasing the deployment thresholds to unattainable values 45 milliseconds into the crash sequence. With this calibration in place, no matter how severe the inputs the SDM received immediately after 45 milliseconds, the airbags and pretensioners will not deploy until a reset has occurred.~~ during a dead zone. The dead zone starts with a cutoff time imposed by GM after the SDM “wakes up.” At this early stage, Plaintiffs note that time used and recorded by the SDM software (i.e. 45ms, 50ms, 100ms, etc.), including the time elapsed for purposes of triggering the cutoff and resulting dead zone, is complex. As a general matter, it refers to time as calculated in the software, as opposed to traditional, linear time.

41. Putting aside whether any cutoff is necessary in light of advancements in modern airbag technology, GM Trucks selected cutoff times that are reached too soon by any measure, i.e., cutoff times of less than approximately 100 milliseconds, which is a more realistic time period for crash sequences to progress, and the safer window used by GM cars.¹⁴ At the premature cutoff time used by GM Trucks, the algorithm increases the deployment thresholds to unattainable values, meaning that no matter how severe the inputs the SDM receives, the airbags and pretensioners will not deploy. Further, when the SDM clock is above the cutoff time, this dead zone does not end until SDM reset, and thus persists through foreseeable real world collisions. In sum, this defective design and premature cutoff—the SDM Calibration Defect—introduces a dead zone to a window where airbag deployment is often necessary in real-world crashes, but by design cannot happen.

42. Cutting off airbag deployment in the short duration GM Trucks used was callous and dangerous, particularly when compared to the time for a typical “crash duration” in a

¹⁵ ~~At this early stage, Plaintiffs note that the interpretation of time recorded by the SDM software and in related Crash Data Reports is complex. The 45-millisecond timing described in this complaint refers to the value as calculated in the software, as opposed to 45 milliseconds in linear time.~~

¹⁴ See ¶¶ 109-110 and Mr. Caruso’s McCoy report, *infra*.

straightforward frontal, vehicle-to-barrier collision, which lasts for approximately 80-150 milliseconds (0.08-0.15 seconds), much longer than the cutoff imposed by GM Trucks (approximately 50 milliseconds or less).¹⁵ And of course, more complex, multi-impact crashes may take even longer.

43. This defective calibration was no accident; rather, as detailed below, GM included it by design when it modified the SDM software program (originally known as ALGO-S) in the Class Vehicles to include it. In affirmatively and prematurely blocking these critical safety features ~~after 45 milliseconds~~ while a crash is foreseeably still underway, GM greatly and needlessly increased the risk of injury and death in a variety of frontal crashes. ~~Specifically, the SDM Calibration Defect manifests in frontal crashes that require airbag deployment or seatbelt tightening after 45 milliseconds into the crash, and before the SDM resets.~~ during the “dead zone.”

44. ~~6.~~ For example, this includes frontal crashes with multiple, distinct points of impact known as “concatenated” events. A vehicle that first hits a curb and then veers and hits a tree, or first hits a speed bump and then crashes into the vehicle in front of it, are examples of concatenated crashes. By their nature, concatenated accidents involve multiple discrete inputs for the SDM to detect during a crash sequence.

45. ~~7.~~ In concatenated crashes, the first part of the incident (hitting a curb) sends the SDM into its “wake up” or “stand by” mode. The initial curb hit does not trigger the airbag or tighten the seatbelt, but the SDM “wakes up” to confirm whether further irregular signals will follow and indicate a need for the seatbelts or airbags. In the Class Vehicles—because of the software calibration that controls the SDM—the “wake up” mode lasts for ~~just 45~~ approximately 50 milliseconds or less after the first irregular signal. After that ~~time, and by GM’s design, the deployment thresholds in the software drastically increase, such that~~ point on the clock, no further input, no matter how severe, could exceed the thresholds and trigger the airbags to deploy and/or seatbelts to tighten. As detailed in this section, the triggering thresholds are pre-set inputs in the software that tell the SDM that a crash is severe enough to deploy an airbag.

¹⁵ Chan, supra note 6, at p. 169.

1 46. ~~8.~~ In addition to concatenated crashes, the SDM Calibration Defect is also
 2 implicated in frontal crashes that increase in severity and require airbag deployment or seatbelt
 3 tightening after an initial, “soft” impact. These types of crashes are referred to herein as
 4 “prolonged” or “long-soft” crash onsets. This would include, for example, a crash into another
 5 vehicle’s bumper which—because the bumper is comparatively “soft”—may take time before the
 6 “soft” bumper collapses, and a “hard” impact into the engine compartment begins.¹⁶ “Soft”
 7 crashes involve a “relatively long crash duration” that may last 20-50 percent longer than a head-
 8 on crash into a rigid barrier, like a cement wall.¹⁷

9 47. ~~9.~~ In a prolonged onset crash, the initial impact into a “soft” surface, such as a
 10 bumper, starts the SDM clock ticking. Depending on the crash conditions—such as speed, road
 11 incline, angle of impact, weather, ice on the road, etc., this “soft” impact may not require airbag
 12 deployment ~~before 45 milliseconds has elapsed~~ right away. Throughout the initial “soft” impact,
 13 the SDM will be in wake-up mode to search for a confirmatory signal. But it will not find another
 14 input sufficient to trigger the airbags from the “soft” impact. ~~As explained above, in~~ In the Class
 15 Vehicles, the SDM ~~clock will then~~ effectively ~~times out when the 45-millisecond mark hits~~ time
 16 out at the cutoff imposed by GM Trucks. So, if the crash proceeds through the “soft” layers and
 17 into the engine compartment of another vehicle during the “dead zone” after the cutoff—such that
 18 airbag deployment is needed to protect the occupants at say, 75 milliseconds, ~~no~~ on the SDM
 19 clock—no airbag or seatbelt deployment is possible no matter how severe the ~~later,~~ “hard” impact
 20 ~~gets~~ is.

21 48. ~~10.~~ In practice, this means that the airbags and seatbelt pretensioners in the Class
 22 Vehicles ~~can only fire within 45 milliseconds of a first, irregular signal~~ cannot fire during a time
 23 period in crashes when they are necessary. If a second, irregular signal occurs after ~~45~~
 24 ~~milliseconds, but before the SDM has reset~~ the cutoff GM imposed due to its defective strategy,
 25 the SDM purposefully, by design, disregards the second signal, even if it would otherwise trigger
 26

27 ¹⁶ An example of a “soft” crash is where a vehicle crashes into a deformable barrier, or crashes at
 28 an angle, which will result in a “softer” impact than a head-on crash into a rigid barrier (which is
 a “hard” crash). Chan, *supra* note 6, at p. 40.

¹⁷ Chan, *supra* note 6, at p. 40.

airbag deployment and/or seatbelts to tighten. The net result is a “dead zone” ~~starting just 45 milliseconds into a crash, after,~~ during which vehicle occupants are completely vulnerable ~~before the SDM software resets.~~ 11. The during a complex or long-duration crash. When the SDM clock is above the cutoff time, the dead zone lasts until the SDM detects that the crash has ended completely (meaning that the irregular signals have concluded, and the vehicle has resumed normal operation), and then resets back to normal mode. After the SDM has reset, additional impacts or irregular inputs register as new events, triggering the process to begin anew.

49. ~~12.~~ This significant gap in protection ~~after 45 milliseconds due to the cutoff~~ is unreasonably dangerous because accidents—particularly complicated, real-world accidents—are not necessarily completed at ~~that point~~ the aggressive cutoff points GM used. In many cases, a crash continues in the “dead zone,” and ~~airbags and~~ the thresholds ~~for airbag and seatbelt~~ severe enough to trigger deployment are technically met during that time, but rendered inert. ~~Yet GM cars recognized this when it used a materially longer and safer cutoff for its vehicles. In contrast,~~ GM’s SDM software calibration in the Class Vehicles ~~prevents deployment of the airbags and seatbelt pretensioners in the~~ with its early “dead zone” ~~while a crash is still underway—which~~ is a serious, unjustified, and dangerous safety defect. ~~Indeed, even GM’s own cars division includes a significantly longer window for potential deployment.~~

C. **GM knew that the SDM Calibration Defect was dangerous and unjustified but has failed to warn or compensate consumers.**

50. GM knew or had reason to know of the SDM Calibration Defect and the risks it entails from at least July 10, 2009, when GM acquired substantially all of Old GM’s books, records, and personnel, and the knowledge about the defective SDM software calibration those books, records, and personnel held. GM has continued to acquire knowledge—based on lawsuits implicating the SDM Calibration Defect and hundreds of publicly reported accidents with airbag and seatbelt failures—from 2009 to the present.

51. Nonetheless, GM has continued to conceal this problem and the pattern of accidents, injuries, and deaths that have resulted from it. GM has failed to share this information with the consumers who paid for and drive these Class Vehicles every day.

52. It should come as no surprise that GM has unreasonably and unsafely delayed disclosure of the SDM Calibration Defect. Indeed, GM has a recent history of attempts to avoid the costs, potential liabilities, and reputational harms from a safety recall for Takata airbags and seems to have repeated that same tactic here.

53. As is now public knowledge, millions of GM vehicles contain the dangerous and defective Takata airbag inflators that can explode with too much force and spray metal shrapnel into vehicle passenger compartments. While the dangers of these Takata airbags were widely known for years, GM lobbied regulators to delay a recall for its affected vehicles to avoid a resulting hit to its profits.¹⁸ In 2016, GM reported that recalling its vehicles with Takata inflators would cost hundreds of millions of dollars.¹⁹

54. Consumers brought a putative class action seeking redress. *See In re Takata Airbag Product Liability Litigation*, Case No. 14-cv-240009, Dkt. 2750, (S.D. Fl.). While other vehicle manufacturers had earlier and voluntarily recalled their vehicles with Takata airbags, it was only years later, with that consumer litigation pending, that GM finally issued a belated recall. And importantly, it did so only after regulators from NHTSA denied GM's petition for inconsequentiality, in which it attempted to argue that a recall was not necessary.²⁰

55. Here, as in *Takata*, GM knew or should have known that the SDM software calibration strategy in the Class Vehicles—which includes a dead zone that prematurely prevents the airbag and seatbelts from ~~deploying after 45 milliseconds until the SDM resets—was~~ deploying—was dangerous. Nonetheless, GM kept using it anyway, did not recall or repair the Class Vehicles to correct it, and still has not told consumers about it.

¹⁸ “GM seeks to delay recall of 1 million vehicles with Takata air bag inflators.” *Reuters*, September 16, 2016. Available at: <https://www.reuters.com/article/us-gm-recall/gm-seeks-to-delay-recall-of-1-million-vehicles-with-takata-air-bag-inflators-idUSKCN11M27N> (last visited ~~January 26~~ July 27, 2023).

¹⁹ *Id.*

²⁰ “GM will recall 7 million vehicles for air bag issue worldwide.” *Reuters*, November 23, 2020. Available at: <https://www.reuters.com/article/us-gm-recall/gm-will-recall-7-million-vehicles-for-air-bag-issue-worldwide-idUSKBN2831TH> (last visited ~~January 26~~ July 27, 2023).

1 1. **Old GM recklessly downplayed serious risks of injury when it chose to**
 2 **include the SDM Calibration Defect in the Class Vehicles.**

3 56. In general, the vehicle manufacturer provides the requirements to set the
 4 deployment thresholds in the SDM software calibration that will trigger a command to fire the
 5 airbags and/or tighten the seatbelts. The vehicle manufacturer uses results from laboratory crash
 6 testing to inform these parameters.²¹

7 57. But laboratory results are not sufficient in themselves, because real-world
 8 accidents—which can occur from multiple angles and involve inputs from myriad variables like
 9 weather, temperature, or incline—will differ from the testing environment.²² For that reason,
 10 manufacturers must exercise appropriate care to design crash sensing frameworks that function to
 11 keep people safe in the real world.

12 58. As relevant to the defect here, Old GM worked with Delco Electronics (later called
 13 Delphi Electronics, now known as Aptiv) to select and install SDM models and develop the SDM
 14 software program used in the Class Vehicles, starting with Model Year 1999. As to the physical
 15 component, Old GM installed Delco SDMs in many of its vehicles, including all the Class
 16 Vehicles. The model names for Delco SDMs have changed over time, and have included, from
 17 earliest to latest, models known as the SDM-GS,²³ SDM-11, SDM30, and others. GM continued
 18 to use Delco SDMs and the defective calibration in its vehicles after it was formed in 2009,
 19 including in all the Class Vehicles.

20 59. In addition to the Delco hardware, GM also worked with Delco to develop and
 21 implement the software that controls the SDMs. To that end, Delco developed a proposed
 22 software program, known originally as ALGO-S, and presented it to Old GM for review.

23 60. During this time, Old GM divided the design and development of its vehicles into
 24 a “cars” group and a “trucks” group, with the ~~trucks group~~ Trucks Group responsible for design,
 25 development, and production of larger model trucks and SUVs. After it reviewed the Delco

26
 27 ²¹ Huffman, *supra* note 9.

28 ²² Solomon, *supra* note 10, at 13.

²³ The SDM-GS is the SDM model included in Mr. Nossar’s 2005 Trailblazer, which would have
 been in development during Mr. Caruso’s tenure with Delco, which ended in 2006.

1 team's proposed SDM software algorithm, ALGO-S, the ~~trucks-group~~ Trucks Group insisted on
 2 adding the ~~45-millisecond-aggressive and premature~~ cut off ~~described above~~ when it calibrated
 3 that program for use in its trucks and SUVs. Specifically, the Trucks Group insisted on a limit at
 4 approximately 45 milliseconds, well before a real-world accident could foreseeably require airbag
 5 deployment.

6 61. The ~~45-millisecond-premature~~ cut off was dictated by GM ~~trucks~~ Trucks as part of
 7 its calibration strategy for all vehicles within the fleet. This means that regardless of any
 8 differences across makes and model years, all vehicles ~~within the group~~ under the direction of the
 9 Trucks Group include SDM software that was calibrated to meet GM ~~trucks~~ Trucks' guiding
 10 philosophy for when and how the safety systems will deploy, which included the SDM
 11 Calibration Defect.

12 62. On information and belief, the ~~trucks-group~~ Trucks Group insisted on this cutoff
 13 based on test results which indicated that frontal-barrier accidents (i.e., a simulated, single-impact
 14 crash into a hard barrier) in its trucks and SUVs would not require ~~airbags~~ airbag deployment
 15 after approximately 45 milliseconds or less in laboratory conditions.

16 63. In response, the Delco team expressly warned the ~~trucks-group~~ Trucks Group that
 17 such an aggressive cutoff could fail to capture additional signals in complex crashes outside of the
 18 laboratory, leaving occupants completely unprotected during prolonged onset crashes or crashes
 19 with multiple impact points. Put another way, using a limit derived from laboratory testing results
 20 was not reasonable or safe, because it fails to account for the complexities and durations of real
 21 world crash events, which can reasonably and foreseeably take twice as long as the laboratory
 22 tests to require airbag deployment. On information and belief, documents, records, and personnel
 23 reflecting GM ~~trucks~~ Trucks' insistence—over Delco's objection—to include this cutoff were
 24 passed on from Old GM to New GM in 2009.

25 64. GM's own cars group, and on information and belief, other major vehicle
 26 manufacturers throughout the industry, include a significantly longer window for the SDM to
 27 detect a potential accident and deploy the airbags and seatbelts. Indeed, in the ALGO-S program
 28 as it was originally designed by Delco, the window in which the airbags and seatbelts can deploy

in a crash is ~~multiple times the level set by GM Trucks (up to 150 milliseconds). Tellingly, after the Delco team repeated the same warnings about the truck group's proposed 45-millisecond cutoff to GM's cars group, the cars group rejected the shorter cutoff. Instead, the cars group used the ALGO-S software with the Delco recommended period that was two or even three times longer than the GM Trucks group's proposal. GM ignored this decision by the cars group in insisting on the dangerous calibration~~ at a minimum twice to three times that used by GM Trucks. Delco's original ~~150-millisecond window~~ design reasonably allows for airbag and seatbelt deployment in real-world frontal crashes, which themselves can endure for ~~up to 100 or even 150~~ up to 100 or even 150 millisecond^{24, 24}. ~~When As such, when~~ When As such, when GM trucks added the defective ~~45-millisecond premature~~ 45-millisecond premature cutoff to the software calibration in the Class Vehicles, it ~~prematurely, and~~ prematurely, and dangerously, prevented the airbags and seatbelts from functioning when a frontal crash may still be well underway.

65. 11. Tellingly, after the Delco team repeated the same warnings about the Truck Group's proposed cutoff strategy to GM's cars group, the cars group rejected the shorter cutoff. Instead, the cars group used the ALGO-S software with a materially longer deployment window than GM Trucks group's proposal (a minimum of approximately 100 milliseconds for deployment). GM thus also ignored the cars group's decision in insisting on the dangerous calibration for trucks and SUVs.

66. Given their serious concerns about GM Trucks' deployment strategy, Mr. Caruso and his Delco team refused to release the defective software calibration for use in GM trucks and SUVs until Old GM signed a disclaimer of Delco's liability for the modified calibration. The ~~trucks group~~ Trucks Group still insisted on the defective calibration, signed the disclaimer, and the ~~45-millisecond cutoff~~ dangerous dead zone was added in the SDM software calibration ~~as~~ as used in GM trucks and SUVs.²⁵

²⁴ ~~Chan, supra note 6, at p. 169.~~

²⁴ Chan, supra note 6, at p. 169.

²⁵ See Objection to Defendants' Motion for Partial Summary Judgment, *McCoy v. General Motors LLC*, Case No. X03- HHD-CV-20-6142910-S (Conn. Sup. Ct), available at: <https://civillinquiry.jud.ct.gov/DocumentInquiry/DocumentInquiry.aspx?DocumentNo=23354481>.

67. This defective calibration was included in all of the trucks and SUVs under the direction of GM's ~~trucks group~~ Trucks Group, including all the Class Vehicles. This is so because, as explained above, the abrupt cutoff was part of a calibration philosophy that is not vehicle dependent, i.e., it was a decision on the overall strategy for safety system deployment that applied to all vehicles within the group, including all the Class Vehicles.

68. In practice, this meant that GM Trucks leadership set the calibration strategy for all vehicles within the Trucks group (including all the Class Vehicles), and the software engineers tasked with implementing that strategy for individual vehicle platforms were obligated to follow that strategy for all vehicles within the group—the strategy was not set, or adapted, at the individual vehicle level.

69. This group-level approach to vehicle software is logical from a cost and resources standpoint; developing software algorithms is time intensive and expensive, making it effective and ordinary practice to develop one algorithm for use across multiple vehicle makes and models.

70. This typical practice of using the same SDM software strategy for groups of vehicles is evidenced by a prior recall conducted by GM in September 2016. Specifically, GM previously recalled some 3,640,000 vehicles across three different model years (from 2014 to 2017) due to a “software defect” present in the SDM software in all of those vehicles. As GM described it, the SDM software in *all of these* vehicles included the same “oscillation test” in the software that could “interfere with the SDM’s proper deployment of frontal airbags or pretensioners as required.”²⁶

71. This oscillation-test issue is distinct from the ~~45-millisecond cutoff~~ defect described in this case, but GM’s use of the same software with the identical defective oscillation test in more than three and a half million vehicles is evidence that GM developed and applied the same SDM software across a very large range of makes and model years.

72. The widespread use of this same oscillation test in the SDM software used for a wide variety of makes and models, including both GM cars and trucks, also supports Plaintiffs’

²⁶ See General Motors LLC Part 573 Vehicle Safety Recall Report, 16-V-651 (September 2016) available at: <https://static.nhtsa.gov/odi/rcl/2016/RCLRPT-16V651-2475.PDF>.

1 allegations in this case that both GM trucks and GM cars used the same SDM software algorithm
 2 (which started as ALGO-S) to control the SDMs in the vehicles under their direction, but that GM
 3 ~~trucks~~ Trucks modified the algorithm as designed to include the SDM Calibration Defect.

4 73. Finally, the use of the same software calibration strategy across many different
 5 vehicles is further supported by Mr. Caruso's description of his work with Old GM in setting and
 6 implementing the software calibration strategy for vehicles at the group level, for the ~~trucks-group~~
 7 Trucks Group and cars group. See, e.g., Nossar Report, *supra*, at p. 5 (Mr. Caruso recounting the
 8 "GM Truck Groups' edict to set certain crash sensor calibration parameters outside the
 9 recommended minimum guidelines set by the crash sensing algorithm designers").

10 2. ~~The 45-millisecond GM's aggressive~~ cutoff was not necessary to
 11 protect against "late" airbag deployments.

12 74. GM ~~trucks-group's~~ Trucks Group's insistence on the ~~45-millisecond window~~ early
 13 cutoff after which the airbags and seatbelts cannot deploy was unjustified and unsafe.

14 75. On information and belief, the ~~trucks-group~~ Trucks Group chose to set this
 15 aggressive cutoff due to concerns about the potential for airbags to deploy "too late" during an
 16 accident. But as the ~~trucks-group~~ Trucks Group also knew, these concerns were unwarranted
 17 given technology that mitigated the risks of "late" airbag deployments.

18 76. A brief history of airbags in motor vehicles puts this dangerous decision in
 19 context. Before 1998, airbag systems were effectively one-size-fits-all. Designed to protect
 20 against only frontal crashes, these "first-generation" airbags were built to meet a standardized
 21 government test that required they protect an unbelted, midsize adult male dummy (175 pounds)
 22 in a 30-MPH crash into a rigid barrier.²⁷ To do so, an airbag had to fill up quickly with gas,
 23 resulting in a deployment speed of up to 200 MPH.²⁸

24
 25 _____
 26 ²⁷ Jack Keebler, *Airbags Safe Insane? – Special Report*, Motortrend (Sept. 1, 2000),
 27 <https://www.motortrend.com/news/airbags-safe-insane-special-report/> (last visited ~~January 26~~ July
 28 27, 2023).

²⁸ *Id.*; see also David B. Ottaway & Warren Brown, *From Life Saver to Fatal Threat*, The Wash.
 Post (June 1, 1997), <https://www.washingtonpost.com/archive/politics/1997/06/01/from-life-saver-to-fatal-threat/56d05b9e-a1bc-49b7-beb4-43480762b25e/> (last visited ~~January 26~~ July 27, 2023).

77. Not all vehicle occupants fit this description, however, and the intensity of first-generation airbag deployment could prove dangerous for children and those who were positioned too close to the bag when it inflated (for example, because they had already been thrown forward toward the steering wheel during an under-way accident).²⁹

78. Public perception about airbag safety in motor vehicles, and in turn, the vehicle manufacturers that sold them, turned increasingly unfavorable following reports of late and aggressive deployments in first-generation airbags. Both regulators and vehicle manufacturers recognized the need to address these issues.³⁰ Beginning in October 1995, NHTSA initiated a series of actions to minimize and eventually eliminate the adverse effects of late and aggressive airbag deployments while preserving their life-saving benefits.³¹

79. In 1997, NHTSA issued modified federal rules to allow automakers to reduce the energy in frontal airbags. This led to “an industry-wide changeover” to “redesigned” airbags in the very next model years (1998-1999).³² The “redesign” consisted of several new technological innovations. The first and immediate solution was “depowered” airbags: automobile manufacturers removed some of the gas-generating propellant or stored gas from the inflators to reduce the pressure and velocity of deployments. This change alone was highly effective in reducing low-to-moderate speed fatalities.³³

80. Other innovations to reduce the risk of aggressive deployments included reducing the volume or rearward extent of airbags, positioning them further from occupants, revised folding techniques, and tethering and shifting from pyrotechnic inflators to hybrids including stored gas.³⁴

²⁹ Susan A. Ferguson & Lawrence W. Schneider, *An Overview of Frontal Airbag Performance with Changes in Frontal Crash-Test Requirements: Findings of the Blue Ribbon Panel for the Evaluation of Advanced Technology Airbags*, Traffic Injury Prevention 3 (Nov. 2008).

³⁰ U.S. Department of Transportation, NHTSA, *An Evaluation of the 1998–1999 Redesign of Frontal Air Bags*, NHTSA Technical Report No. DOT HS 810 685, p.11, (August 2006) [hereinafter “NHTSA Redesign Report”]; see also Ferguson & Schneider, *supra* note 29.

³¹ NHTSA Redesign Report, *supra* note 30, at vii.

³² *Id.*; see also Micah Wright, *The Hidden Dangers of Older Airbags*, MotorBiscuit (May 8, 2015), <https://web.archive.org/web/20220630111938/https://www.motorbiscuit.com/the-hidden-dangers-of-older-airbags> (last visited January 26, 2023).

³³ See NHTSA Redesign Report, *supra* note 30, at 25.

³⁴ *Id.* at vii.

81. Old GM knew about and employed these new technologies in its vehicles. Indeed, as the director of Old GM's Safety Center Terry Connolly said in 2000, there were no significant downsides to using this new "depowered" airbag technology, even for unbelted passengers.³⁵

82. Further innovations referred to as "advanced" or "smart" airbags followed soon thereafter.³⁶ "Advanced" airbags alter deployment patterns according to feedback from several sensors. These sensors tailor how the airbag deploys based on the severity of the crash, the size and posture of the vehicle occupant, whether the occupant is wearing a seatbelt, and how close the occupant is to the airbag.³⁷

83. Many "advanced" systems use dual-stage or multi-stage inflators. This means that they have two inflation stages that can be ignited sequentially or simultaneously depending on crash severity.

84. "Advanced" airbags phased into production beginning September 1, 2003 and were required in all new vehicles by September 1, 2006.³⁸

85. Thus, based on the depowered and advanced airbag technology starting in 1998 and 1999, the risks posed by "late" deployments in early generation airbags had greatly diminished. Indeed, while NHTSA estimates that more than 290 deaths were caused by frontal airbag inflation between 1990 and 2008, nearly 90 percent of those deaths occurred in vehicles manufactured before 1998 (i.e., with first-generation airbag technology).³⁹ Today, with this new technology, serious injuries from properly functioning airbags are rare.⁴⁰

86. Despite knowledge and use of the new technology mitigating the risks of late deployments, the ~~trucks group~~ Trucks Group still insisted on prematurely shutting off the airbags and seatbelts in the Class Vehicles ~~after 45 milliseconds~~ long before the 100 millisecond minimum window reasonably required by real-world crashes, and used by GM's own cars group. On information and belief, despite these well-established advancements in airbag technology outlined

³⁵ Keebler, *supra* note 27.

³⁶ See NHTSA Redesign Report, *supra* note ~~30~~ 31 at p. 3.

³⁷ Wright, *supra* note ~~32~~ 33.

³⁸ NHTSA Redesign Report, *supra* note ~~30~~ 31, at vii.

³⁹ Insurance Institute for Highway Safety. "Airbags" (2021), available at: <https://www.iihs.org/topics/airbags> (last visited ~~January 26~~ July 27, 2023).

⁴⁰ *Id.*

1 above, GM continued to use this same defective software calibration strategy in its vehicles in
2 2009 and beyond.

3 **3. GM knew about a pattern of suspicious accidents involving the SDM**
4 **Calibration Defect in the Class Vehicles.**

5 87. GM's reckless decision and continued disregard for clear warnings about the risks
6 in shutting off the SDM too soon during an accident has had real and tragic consequences.

7 88. As outlined above, GM has known about the SDM Calibration Defect since it took
8 over Old GM's books, records, and personnel in 2009. GM has continued to accrue knowledge of
9 the defect, and its serious consequences, in the years since. Indeed, GM has known about,
10 investigated, and even litigated numerous crashes in which airbags suspiciously failed to deploy
11 in multi-impact or prolonged-onset frontal crashes in the Class Vehicles—a clear indication of the
12 SDM Calibration Defect.

13 89. Despite obvious signs of a known and dangerous risk, GM concealed these
14 accidents and the SDM Calibration Defect from consumers and regulators to avoid or at least
15 delay a recall and the attendant costs and reputational damage therefrom. To date, GM has taken
16 no corrective action to repair or recall the Class Vehicles to address this defect.

17 **a. GM has litigated (and settled) many personal injury lawsuits**
18 **for suspicious airbag failures in the Class Vehicles.**

19 90. In addition to its institutional records and knowledge, GM was on notice of the
20 SDM Calibration Defect through litigating and settling personal injury lawsuits involving airbag
21 and seatbelt failures consistent with the SDM Calibration Defect.

22 91. As noted above, Chris Caruso has served as an expert witness in many of these
23 lawsuits. Mr. Caruso has “over 43 years working in the automotive engineering field.” Exhibit D
24 at 4. This includes work as an engineer for Old GM from 1979 to 1986. Thereafter, from 1986 to
25 2006, Mr. Caruso worked for Delco Electronics, where he was “involved in the development and
26 implementation of the second generation of airbag system on GM vehicles and their subsidiaries
27 in the US.” *Id.* at 1. Mr. Caruso also worked as a “lead engineer in the development of crash
28 sensor specifications and the airbag sensing systems for major OEM's worldwide,” including Old

1 GM, and himself “designed the SDM crash sensing algorithms.” *Id.* at 1-2. Mr. Caruso worked
 2 for Delco through August of 2006. Thereafter, he began work in his current role as a consultant
 3 with Automotive Safety Consulting, where he has “served as a consultant for both plaintiffs and
 4 defendants in numerous cases involving automotive safety systems, including cases involving
 5 EDR/CDR downloads and readouts.” *Id.* at 4.

6 92. Mr. Caruso recounts much of this work experience and the history of the SDM
 7 Calibration Defect in public documents in a case filed in 2011, just two years after GM was
 8 formed.

9 93. In that case, Plaintiff James Nossar sued GM LLC following a crash in his 2005
 10 Chevrolet Trailblazer (a Class Vehicle here). As detailed in that complaint, on or about February
 11 25, 2010, Mr. Nossar drove his Trailblazer into the back of a 1999 Suburban “and sustained a
 12 moderate to severe frontal impact . . . at a rate of speed that exceeded the airbag system’s
 13 predetermined deployment threshold.” *See Nossar v. General Motors LLC*, Dkt. 4, Case No. 1:11-
 14 cv-02129 (N.D. Ga.). Despite this “significant frontal collision,” the airbag failed to deploy and
 15 seatbelt pretensioners failed to trigger. Without the airbag or seatbelt to protect him, Mr. Nossar’s
 16 head slammed into the steering wheel, which caused “fracturing practically every bone in his face
 17 and brain injuries.” *Id.*

18 94. In support of his claims, in April 2012, Mr. Nossar filed an expert report from
 19 Chris Caruso who, as explained above, is an expert in automotive crash sensing systems who
 20 worked for Delco engineering during the development of the defective SDM software calibration
 21 in the Class Vehicles. *See id.* at Dkt. 40-1.

22 95. In that report, Caruso detailed the same flaws in the SDM software calibration
 23 described herein. He explained that the airbag sensing system in the Trailblazer was “defective by
 24 design and has the potential to not deploy frontal impact airbags in high speed frontal impacts
 25 where conditions vary slightly from the perfect laboratory conditions where the system was
 26 designed and tested.” Based on Caruso’s experience working in the development of the SDM
 27 software, he related that there were concerns, due to the calibration, “that in longer duration, but
 28 high severity events and in concatenated events (such as a curb impact followed by a utility pole

1 impact), the airbags would fail to deploy because the algorithm deployment thresholds were no
2 longer active.” *Id.*

3 96. Caruso further explained that as that litigation proceeded into discovery, he would
4 “expect to identify emails and other correspondence between GM Truck Engineers and Delphi
5 Crash Sensor engineers discussing the concerns over GM Truck Groups’ edict to set certain crash
6 sensor calibration parameters outside the recommended minimum guidelines set by the crash
7 sensing algorithm designers [the Delphi/Delco engineers].” Caruso expected to obtain this
8 corroborating evidence because he “ha[d] seen these documents before and kn[e]w the content,”
9 and summarized that **“the calibration values result in premature turning off of algorithm**
10 **thresholds which effectively disables the front airbags after 45 to 50ms.”** *Id.* (emphasis
11 added).

12 97. Mr. Caruso’s expectations as to what discovery would reveal are plausible because
13 of his contemporaneous experience with Delco and Old GM in the time period in which Mr.
14 Nossar’s vehicle was developed. Mr. Caruso left Delco in 2006, long after the development
15 concluded for Mr. Nossar’s model year 2005 vehicle. (Because vehicles are actually sold in their
16 model year, *i.e.*, 2008 vehicles are sold in 2008, their [design and development](#), [including for the](#)
17 [SDM software](#), predates the actual model year by, one, two, or more years).

18 98. As to Mr. Nossar’s 2005 Trailblazer specifically, Caruso observed that the vehicle
19 included a version of the SDM hardware known as the SDM-DS, and concluded:

- 20 • The airbags and seatbelts failed because, at the time the airbags should have
21 deployed, and consistent with the SDM Calibration Defect here, **“the SDM**
calibration had already timed out after 45-50ms after the crash started.”
- 22 • “In reviewing the crash performance of the sensing system for the subject vehicle,
23 with respect to the conditions of the subject crash, **it is clear that the calibration**
24 **values result in premature turning off of algorithm thresholds which**
25 **effectively disables the front airbags after 45 to 50ms.”**

26 99. “The failure by GM to understand the **risks of certain dictated calibration**
27 **values** [in the SDM software calibration] led directly to the design defect that rendered the frontal
28

1 impact airbag system in the 2005 Chevrolet Trailblazer defective and unreasonably dangerous in
2 certain field relevant, real-world crashes.” *Id.*

3 100. GM LLC, a named defendant in the *Nossar* case, clearly knew about and received
4 Mr. Caruso’s report outlining the history of these issues in the SDM software calibration.

5 101. The *Nossar* case and Mr. Caruso’s report support that Old GM continued to install
6 SDMs with the Calibration Defect in its vehicles at least through model year 2005.

7 102. More recently, Mark McCoy filed a lawsuit against GM LLC in 2020 after a
8 serious accident in his 2018 Sierra Denali 2500. *See McCoy v. General Motors LLC*, Case No.
9 X03- HHD-CV-20-6142910-S (Conn. Sup. Ct).

10 103. While on a freeway exit ramp, at a sharp turn, Mr. McCoy veered off the road,
11 crashed into a fence, and then crashed into a trailer, before finally crashing into a construction
12 vehicle parked near the ramp. None of the airbags in his vehicle deployed. As a result, Mr.
13 McCoy sustained “catastrophic, painful and severely debilitating injuries,” including traumatic
14 spinal injuries, total paralysis from the chest down, a traumatic brain injury, and a broken nose,
15 among other injuries.⁴¹ Below is a picture of Mr. McCoy’s Denali after the crash:

16
17
18
19
20
21
22
23
24
25
26
27
28 ⁴¹ See June 19, 2020 Amended Complaint, ¶ 8, *McCoy v. General Motors LLC*, Case No. X03-
HHD-CV-20-6142910-S (Conn. Sup. Ct) (“McCoy”). Available at:

<https://civillinquiry.jud.ct.gov/DocumentInquiry/DocumentInquiry.aspx?DocumentNo=19161992>
2730953.6-2820476.3 ~~SECOND~~-THIRD AMENDED CLASS ACTION COMPLAINT
4:21-CV-06338-JST



104. Mr. Caruso also served as an expert for plaintiff in the *McCoy* case and submitted a detailed report in connection with summary judgment briefing in that matter.⁴² Therein, Mr. Caruso described his history with the company, including warning Old GM against using the defective software calibration in trucks and SUVs, and his insistence on a disclaimer of liability before releasing the calibrations for use in the Class Vehicles.

105. Further, Mr. Caruso described his work after he left Delco in 2006 in failure-to-deploy lawsuits “where the root cause was determined to be the 45ms SHUTOFF criteria” [i.e., the SDM Calibration Defect]” in “numerous” GM trucks and SUVs in “earlier model[s]” than model year 2018.⁴³

⁴² Mr. Caruso’s opinions in the *McCoy* case became publicly available only after the April 2022 hearing on the Defendants’ motion to dismiss in this matter, and were also not available at the time Plaintiffs filed their amended complaint in October 2021.

⁴³ Mr. Caruso’s report in the *McCoy* matter is attached hereto as Exhibit D. See *id.* at 19.

106. Through discovery in the *McCoy* matter, Mr. Caruso analyzed the actual software calibration file for the SDM software in Mr. McCoy's model year 2018 vehicle. Based on his review of the file, Mr. Caruso concluded that the algorithm in the 2018 vehicle remained a "carry over" from the SDM software algorithm, ALGO-S, he himself designed years prior. Exhibit D at 16. Moreover, Caruso concluded that [GM's dangerous and defective philosophy about airbag deployment timing persisted](#) in the 2018 Sierra. [Put another way](#), GM "appeared to be using **very similar shutoff times in this calibration**" to those he had previously objected to in earlier model years in which GM "forc[ed] the use of 45ms shutoff times." *Id.* at 18.

[107. Specifically, in the McCoy software, Caruso observed shutoff times at 50 milliseconds, consistent with his earlier testimony in Nossar that the cutoff occurred at approximately 45-50 milliseconds, and others that were even shorter, at 16 milliseconds.](#)

[108. Whether 45, 50, or even 16 milliseconds, each of these cutoff calibrations is defective in the same way, because none are sufficient to account for real world crash events, or come even close to the minimum used by GM cars. Put another way, each creates a "dead zone" far short of the time window needed for deployment in real world crashes, which is the defect that underlies Plaintiffs' claims.](#)

[109. ~~18.~~ The ~~presence of the~~ persistence of this](#) defective calibration [cutoff](#) strategy in a GM truck sold at least 12 years after he stopped working for Delco came as some surprise to Caruso. Indeed, he "had believed" GM would have discontinued the use of the dangerous calibration prior to model year 2018. But the software itself told a different story. In summary, based on the actual software, discovery produced in that case, as well as the crash conditions from the McCoy accident, Caruso opined:

- "The failure to deploy [the] airbags resulted in a condition that was defective, unsafe and unreasonably dangerous" to the driver in this vehicle;
- "[I]t appears that [GM trucks Group] is **still employing very aggressive stop times**" in its software calibrations as of model year 2018; and
- GM should have implemented an "alternative design" to "[m]odify the algorithm calibrations with more robust 120-150ms" cutoff thresholds.

See Exhibit D.

110. ~~19.~~ Caruso's report in the *McCoy* case—notably based on his review of the actual software calibration—demonstrates that at least through model year 2018, GM continued to install Delco SDMs governed by dangerous cutoff thresholds in calibrations based on the original ALGO-S software algorithm. Although it had years to do so, even by 2018, GM had still failed to adopt a safer and more rational design that would allow for deployment for at least as long as the strategy used by GM cars (i.e., approximately 100 milliseconds at a minimum for deployment).

111. ~~20.~~ Mr. Caruso also was able to identify the SDM hardware used in the *McCoy* vehicle as the Delco SDM30, which is evidence that GM continued to use the defective software calibration for all vehicles that contain that Delco SDM model. Publicly available crash data reports from NHTSA show the same Delco SDM30 was installed by GM in GM trucks in at least model years 2015 and 2016, including in the model year 2015 Chevrolet Trax, 2015 Chevrolet Tahoe, and 2016 Yukon Denali.

112. ~~21.~~ Likewise, on information and belief, Plaintiffs Vargas, Ray, and Milstead's Class Vehicles contain SDM-11 model Delco SDMs. Given their model years and the Delco SDM, the plausible, and most reasonable, inference is that they also included the associated defective calibration strategy GM used with Delco SDMs.

113. ~~22.~~ Based on: (1) Mr. Caruso's early knowledge of the SDM Calibration Defect when it was first used; (2) his subsequent tenure with Delco through 2006, during which model year vehicles for subsequent years were already in development; (3) his expert opinion on the presence of the SDM Calibration Defect in a model year 2005 vehicle (*Nossar*) after his assessment of the vehicle performance and crash dynamics; and (4) his opinion about defect's persistence in a model year 2018 vehicle with the Delco SDM30 (*McCoy*)—the plausible, and most reasonable, inference is that the defect persisted in the years between 1999, 2005 and 2018.

114. ~~23.~~ Following service of Mr. Caruso's expert report and deposition in the *McCoy* case, GM agreed to settle the case in December 2022.⁴⁴

⁴⁴ Plaintiffs' allegation of a settlement is supported by plaintiff's request in *McCoy* in October 2022 for additional time to withdraw the case because "additional time is necessary to exchange the necessary settlement documents." See *McCoy*, October 19, 2022 CaseFlow Request. Plaintiff then withdrew the matter last month, in December 2022. See December 19, 2022 Withdrawal of Action, *McCoy v. General Motors LLC*, Case No. X03- HHD-CV-20-6142910-S (Conn. Sup. Ct).

1 115. ~~24.~~ In addition, Chad Vaith filed a lawsuit against GM LLC in 2017 after an
 2 accident in his MY 2014 Silverado. As that complaint relates, in December 2015, Mr. Vaith was
 3 involved in an accident in which he drove his Silverado “off the road into a ditch,” after which he
 4 “continued through the ditch for approximately forty yards before launching over the
 5 driveway/culvert. . . before coming to a final rest approximately twenty yards south.” *See Vaith v.*
 6 *General Motors LLC*, Dkt. 1, Case No. 18-cv-00031 (D. Minn.). Despite multiple impacts in that
 7 prolonged accident, the airbags and seatbelts did not deploy, causing Mr. Vaith to “suffer severe
 8 personal injuries.” Mr. Caruso was a disclosed expert for plaintiff in that case, although his
 9 opinions about the 2014 Silverado were not publicly filed. *See, e.g., id.* at Dkt. 64.

10 116. ~~25.~~ Mr. Vaith’s case proceeded into fact discovery and ultimately resulted in a
 11 “negotiated settlement” between Mr. Vaith and GM. *Id.* at Dkt. 82.

12 117. ~~26.~~ In addition to these previous lawsuits against GM with Mr. Caruso as an expert,
 13 another automotive crash expert, Sal Fariello, wrote directly to GM’s CEO Mary Barra twice in
 14 December 2016 to raise similar concerns about issues he had observed in the airbag sensing
 15 system in model year 2006 GM SUVs. Mr. Fariello’s letters are available in NHTSA’s public
 16 records.⁴⁵

17 118. ~~27.~~ Mr. Fariello’s letters to GM’s CEO focused on an accident in a 2006
 18 Trailblazer (a Class Vehicle here) for which he served as a litigation consultant in a lawsuit filed
 19 in or around 2014. Therein, he lists multiple technical issues with the airbag sensing system that
 20 he wanted to bring to GM’s attention and urge them to address. For example, he cautions that, in
 21 his view:

22 a. “The deployment thresholds [i.e., the inputs that will trigger deployment]
 23 for the airbag were set too high and compromised driver and passenger safety as a result of GM’s
 24 improper effort to mitigate lawsuits related to relatively low speed deployments of the airbag.”;

27 _____
 28 ⁴⁵ Mr. Fariello is a forensic crash investigator. *See* Bill Saporito, “Air Bag Blow Out,” *Time Magazine*, (December 4, 2014). Available at: <https://time.com/3617681/the-air-bag-blowout> (last visited ~~January 26~~ July 27, 2023).

b. “The deployment threshold did not meet GM’s and generally accepted standards for when an airbag should deploy in order to prevent occupant death based on written technical papers and educational videos produced by GM or its employees.”; and

c. “Failure of the SDM to independently process a crash pulse and deploy the airbag implicates a defective software algorithm; specifically ‘Algo S-H’ [the software algorithm in the Class Vehicles].”

119. ~~28.~~ At the time, in 2016, Mr. Fariello proposed that the SDM could be re-programmed “with a more responsive algorithm” to resolve these issues, and that GM’s “only apparent motive for not doing this related to the cost of implementing a recall.”

120. ~~29.~~ Frustrated by the response he received from GM’s counsel in response to these letters, Mr. Fariello then wrote to Senator Bill Nelson of Florida enclosing his correspondence to GM and escalating his concerns. Senator Nelson then forwarded that correspondence to NHTSA.⁴⁶

121. ~~30.~~ As Mr. Fariello concluded, in his view, GM was stalling on this issue “just as they did with the Takata airbag matter.”

122. ~~31.~~ ~~Finally, in~~ In April 2016, plaintiff Kayla Greenwood filed suit against GM on behalf of her deceased parent, Galen Greenwood. *See Greenwood v. General Motors LLC and General Motors Company*, Dkt. 1, Case No. 16-cv-00149 (M.D. GA). Galen Greenwood was fatally injured when his “airbag failed to deploy and his seat belt failed to properly restrain him” during a multi-impact crash in his 2006 GM SUV, a Chevrolet Equinox—hallmarks of the SDM Calibration Defect. *Id.* Specifically, “Mr. Greenwood lost control of the subject vehicle, traveled over the northbound lane and onto the west shoulder in a gradual manner, and impacted two trees with the front of the subject vehicle. During the incident sequence, the driver’s side airbag failed to deploy and the seat belt failed to properly restrain Plaintiff’s decedent. During the impact,

⁴⁶ Mr. Fariello’s letters to GM and further documentation are available at: <https://static.nhtsa.gov/odi/cmpl/2017/CL-10955948-3381.pdf> (last visited ~~January 26~~ July 27, 2023).

1 Galen Greenwood suffered severe injuries which resulted in his death.” *Id.* GM settled with Ms.
2 Greenwood in May 2017. *See id.* Dkt. 20-1.⁴⁷

3 123. Finally, in 2022, Jerome and Cedric Woods filed suit against MFA Oil Company
4 in Missouri state court as survivors of Richard Stinson. Mr. Stinson was killed when his 2009
5 Chevrolet Silverado truck crashed into an MFA Oil Company truck in November 2021. Mr.
6 Stinson’s Silverado was traveling at approximately 46 miles per hour at the time of the collision,
7 and despite the serious “extent of the damage,” the speed of the accident, and the change in
8 velocity from the impact, his airbags did not deploy.

9 124. In or about March 2023, defendant MFA Oil Company filed a third party petition
10 against General Motors LLC in the Woods case. As MFA contends in that third party petition:

- 11 • “Upon information and belief, the airbag system on the Silverado was designed to not
12 deploy under circumstances when the change in velocity of the vehicle [i.e., a
13 deployment threshold input] in the initial 45 milliseconds after the initiation of a
14 collision event was under a set rate regardless of the change in velocity of the
15 vehicle after the initial 45 milliseconds, including a situation such as the collision in
16 this case in which a change in velocity was recorded to exceed 37 miles per hour
17 during the sequence of the collision.”
- 18 • The design settings for deployment of the driver’s side airbag on the Silverado
19 were defective and unreasonably dangerous because the settings prevented
20 deployment of the driver’s side airbag under circumstances such as the collision at
21 issue in this case in which the change in velocity of the vehicle exceeded 37 miles per
22 hour and in which the deployment of the airbag could or would have reduced or
23 entirely avoided serious or fatal injuries such as the injuries Stinson sustained.⁴⁸

24 125. The Woods litigation on Mr. Stinson’s behalf continues.

25 126. ~~32.~~ Taken together, these and other allegations support the existence of the SDM
26 Calibration Defect and the reasonable inference that Plaintiffs’ model years 2010 and 2012 GM
27 trucks and SUVs included it. Specifically, given that: (1) the model years of Plaintiffs’ Class
28

⁴⁷ In the *McCoy* matter, GM’s designated corporate witness testified that he had previously offered testimony in a personal injury lawsuit about a crash where a vehicle “went off the roadway and struck a tree,” where the plaintiff’s name was Greenwood. On information and belief, GM’s corporate designee in the *McCoy* matter was thus also a deponent in this settled Greenwood lawsuit, demonstrating further corporate knowledge of persistent injuries from the SDM Calibration Defect in the field.

⁴⁸ See Third-Party Plaintiffs’ Petition, Woods v. MFA Oil Company v. General Motors LLC, Case No. 22-NM-CV00032 (New Madrid Circuit Court, Missouri).

Vehicles were developed *after* Old GM first used the defective Software Calibration in or about 1999, and not long after Mr. Caruso left his role with Delco in 2006 (during which subsequent model years were already in development); (2) Plaintiffs' Class Vehicles predate the 2018 vehicle in which Mr. Caruso reviewed the software calibration, and concluded that the algorithm still ~~included~~ reflects GM's flawed strategy to cutoff deployment too early, including "very similar shutoff times" to those he had originally raised concerns about twenty years earlier; (3) corroborating instances between those two bookends (1999 and 2018) support the persistence of the defective calibration in the intervening model years (i.e., *Nossar, Vaith, Greenwood, Woods*, and Fariello's letters, discussed *supra*); and (4) the broad, cross-model way that SDM software calibration strategy is set and implemented across GM's fleet within a given model year, the plausible, and most reasonable inference is that GM installed the same defective calibration in all its trucks and SUVs at least through model year 2018.

b. GM knew or should have known about hundreds of publicly reported airbag failures in the Class Vehicles.

127. GM was also on notice of the SDM Calibration Defect and its attendant safety risks from consumer complaints. These complaints are publicly available online through NHTSA's website. Between 1999 and the present, hundreds of consumers reported to NHTSA that airbags and/or seatbelts had suspiciously failed during frontal crashes involving concatenated (multiple) impacts or potentially prolonged crash onsets. New allegations—including Mr. Caruso's report showing the ~~defect~~ defective cutoff strategy continued in a model year 2018 vehicle—make the below crashes even more suspicious as relevant incidents with the hallmarks of the SDM Calibration Defect (airbag and seatbelt failures in concatenated and prolonged frontal impacts) in the very vehicles alleged to be impacted by that Defect (GM trucks and SUVs).

128. On information and belief, vehicle manufacturers such as GM monitor these public databases for complaints about their vehicles, considering their statutory obligations to report known safety defects in their vehicles to NHTSA and to consumers. Moreover, in many of these reports, it is expressly clear that GM was directly informed of, and even investigated, the accident in question. While GM has access to the full body of these complaints from 1999 and onward in

the public database, it bears mention that over three hundred of them were filed after the new GM entities were created in 2009.⁴⁸⁴⁹

129. One such complaint details an accident in a 2004 Chevrolet Trailblazer in August 2014. The driver states that they were traveling 50 MPH on a four-lane highway where another vehicle, waiting to U-turn, “decided to turn right into me—oncoming traffic.” The vehicles crashed, which then “sent [the driver] into a head on collision with the guard rail.” The driver questions that “there were 2 incidents in that sequence of events that the airbags should have deployed, but did not! This accident caused several injuries to myself and my passenger. We definitely could have been killed and no airbags to help save our lives...” Photos of the damage to the vehicle from that accident follow. (NHTSA Complaint #1100694).



000-13679321 08/25/2014 COPYRIGHT 2014 - INSURANCE AUTO AUCTIONS

⁴⁸⁴⁹ Many publicly reported accidents occurred prior to 2009, which information would likewise have been available to Old GM. GM would have acquired Old GM’s knowledge of these accidents, reflected in its books, records, and personnel, when it was formed in 2009.



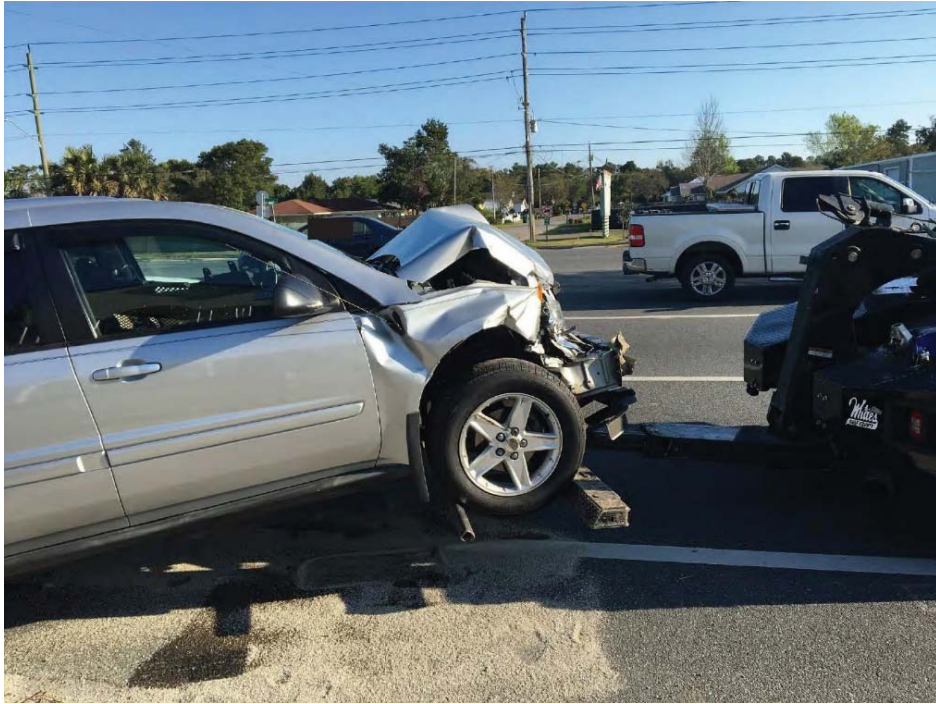
130. Another report describes a September 2012 accident in a 2005 Chevrolet Trailblazer. It states that the driver, at 30 MPH, swerved to avoid a deer in the road, which caused the vehicle to lose control, exit the road, and ultimately “crash[] off a 9 foot embankment.” From there, the vehicle continued to crash through a field, into a dirt levy, and finally into a drainage ditch. None of the airbags deployed. The driver “became unconscious after his head crashed into the steering wheel” and “suffered severe neck injuries.” The dealer later inspected the vehicle but responded that the results were “inconclusive” and that the manufacturer “was notified but offered no assistance.” Photos of the damage to the vehicle from that accident follow. (NHTSA Complaint #942950).⁵⁰

⁵⁰ Accident documentation and photos are available at: <https://static.nhtsa.gov/odi/cmpl/2012/EQ-10477257-8767.pdf> (last visited July 27, 2023).

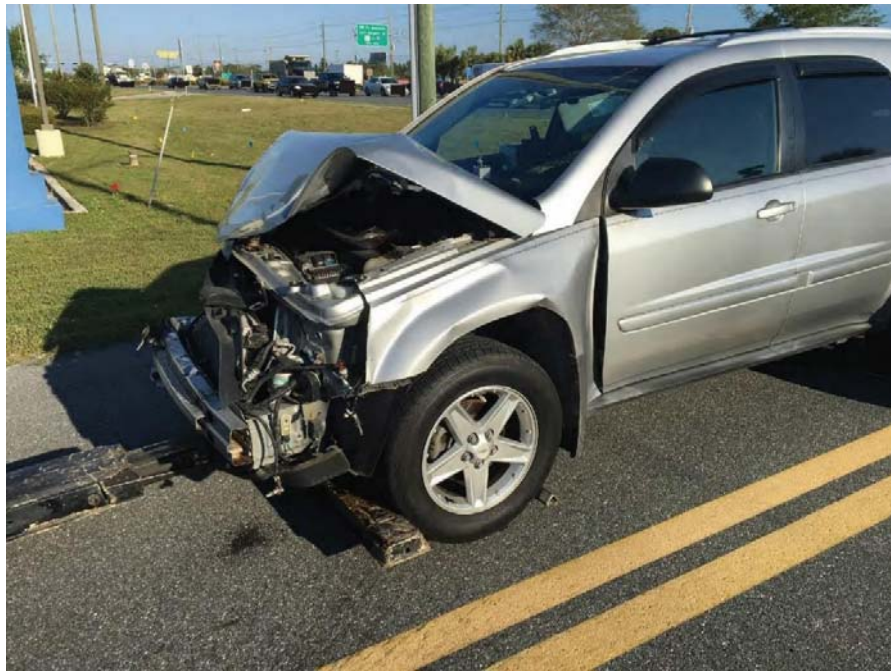


131. In another example, the complaint describes a serious accident in March 2019 involving a 2005 Chevrolet Equinox. The vehicle crashed into the front of another vehicle at 35

1 MPH. The airbags did not deploy. The driver sustained injuries to the head and ankle and
 2 required medical attention. Photos of the damage to the vehicle from that accident follow.



132. (NHTSA Complaint #1550406).⁵⁰⁵¹



133. Another account of a July 2007 accident in a model year 2001 Isuzu Rodeo describes a crash at 65 MPH so severe that “the median on the highway sustained property

⁵⁰⁵¹ Photos and accident information are available at: <https://static.nhtsa.gov/odi/cmpl/2019/EQ-11191960-7090.pdf> (last visited ~~January 26~~ July 27, 2023).

1 damage” and “the vehicle was destroyed,” but the airbags did not deploy. This is how the vehicle
 2 looked after that accident:



12 134. Additional examples of similarly suspicious frontal accidents—i.e., frontal
 13 accidents with multiple discrete impacts, or potentially prolonged onset frontal crashes involving
 14 “soft” impacts—in which the airbags and/or seatbelts failed include:

15 a. NHTSA complaint #753287 dated Tuesday, October 16, 2001, reported an
 16 accident on Monday, October 8, 2001 involving a 1999 CHEVROLET SUBURBAN in Andover,
 17 KS. The complaint states: “60 MPH CROSS WIND BLEW THE SUBURBAN HEAD ON INTO
 18 THE CONCRETE MEDIAN. THE VEHICLE SPUN 360 DEGREES, WENT INTO THE
 19 DITCH, THE FRONT END HIT AGAIN THE VEHICLE WENT UP THE OTHER SIDE OF
 20 THE EMBANKMENT AND STOPPED IN A FIELD. ENTIRE FRONT END OF THE FRAME
 21 NOT REPAIRABLE . . . FRONT CROSSMEMBER BENT AND ENGINE MOVED
 22 UPWARDS AT A 10 DEGREE ANGLE. **AIR BAGS FAILED TO DEPLOY.** *AK”⁵⁴⁵²

23 b. NHTSA complaint #859858 dated Friday, April 7, 2000, reported an
 24 accident on Saturday, April 3, 1999 involving a 1999 CHEVROLET SILVERADO. The
 25 complaint states: “WHILE TRAVELING ON A WET ROAD AT HIGHWAY SPEED OF 60
 26 MPH VEHICLE HYDROPLANED, SPUN INTO A DITCH, AND COLLIDED INTO A TREE
 27

28 ⁵⁴⁵² Emphasis is supplied here and in the paragraphs that follow.

1 WITH BOTH SIDES AND FRONT OF VEHICLE. **UPON IMPACT, AIR BAGS FAILED TO**
 2 **DEPLOY.** MFR. NOTIFIED. *AK”

3 c. NHTSA complaint #877320 dated Wednesday, January 3, 2001, reported
 4 an accident on Friday, December 1, 2000 involving a 1999 CHEVROLET SUBURBAN in
 5 Amarillo, TX. The complaint states: “CONSUMER WAS TRAVELING ABOUT 40MPH ON
 6 HIGHWAY AND ANOTHER VEHICLE VEERED INTO HER LANE, HITTING HER HEAD-
 7 ON, AND PUSHING VEHICLE INTO ANOTHER LANE. **VEHICLE HIT TELEPHONE**
 8 **POLE, AND DUAL AIRBAGS DIDN'T DEPLOY.** CONSUMER WAS INJURED.
 9 CHEVROLET HAS BEEN NOTIFIED. *AK”

10 d. NHTSA complaint #10060150 dated Tuesday, March 2, 2004, reported an
 11 accident on Tuesday, February 24, 2004 involving a 2001 CHEVROLET BLAZER in Austin,
 12 TX. The complaint states: “**DRIVER SIDE AIR BAG FAILED TO DEPLOY IN A CRASH**
 13 **THROUGH: 1. A SIX FOOT TALL WOODEN FENCE AT ALMOST 30MPH, THEN 2. THE**
 14 **EXTERIOR SIDE OF A 2-STORY HOME THAT CONTAINED THE KITCHEN SINK AND**
 15 **PLUMBING FIXTURES, WHILE SMASHING UP AND OVER THE FIFTEEN-INCH**
 16 **CONCRETE FOUNDATION, FRONT-END FIRST.*AK”**

17 e. NHTSA complaint #10082050 dated Thursday, July 15, 2004, reported an
 18 accident on Wednesday, July 14, 2004 involving a 2003 CHEVROLET SUBURBAN in Fresno,
 19 CA. The complaint states: “THE CONSUMER WAS INVOLVED IN AN ACCIDENT WHERE
 20 IT WAS HIT FROM THE FRONT DRIVER SIDE, THE IMPACT CAUSED THE VEHICLE
 21 TO HIT A TELEPHONE POLE HEAD ON. **THE AIR BAGS DID NOT DEPLOY.** *JB”

22 f. NHTSA complaint #10103512 dated Friday, December 10, 2004, reported
 23 an accident on Sunday, December 5, 2004 involving a 2001 CHEVROLET SILVERADO in
 24 Rialto, CA. The complaint states: “CONSUMER’S VEHICLE WAS REAR ENDED WHILE
 25 DRIVING 50 MPH. THE VEHICLE WAS FORCE[D] INTO A SPIN AND THEN, IT HIT A
 26 CONCRETE ROAD DIVIDER. UPON IMPACT, **NEITHER FRONTAL AIR BAGS**
 27 **DEPLOYED.** DRIVER SUSTAINED INJURIES, AND HAD TO BE TRANSPORTED TO A
 28 LOCAL HOSPITAL. DEALER AND MANUFACTURER WERE NOTIFIED. THE

1 CONSUMER STATED THAT THE SEAT BELT DID NOT KEEP HER FROM HITTING HER
2 CHEST ON THE STEERING WHEEL.”

3 g. NHTSA complaint #10108404 dated Tuesday, February 1, 2005, reported
4 an accident on Tuesday, January 11, 2005 involving a 2000 CHEVROLET SILVERADO in
5 Toney, AL. The complaint states: “A CAR PULLED OUT IN FRONT OF ME WHICH STILL
6 HIT THE DRIVER'S SIDE OF MY VEHICLE (2000 CHEVY SILVERADO). **THEN MY**
7 **TRUCK HAD A FULL FRONTAL IMPACT AT GREATER THAN 30 MPH INTO A**
8 **DIRT WALL IN WHICH NEITHER THE DRIVER'S NOR PASSENGER'S AIRBAGS**
9 **DEPLOYED (THE TRUCK IS TOTALLED).** I HIT THE STEERING WHEEL AND GOT A
10 CONCUSSION WITH BLOOD AROUND THE BRAIN, A BROKE CHEEK BONE, AND
11 FRACTURED HIP. MY WIFE WAS 33 WEEKS PREGNANT AT THE TIME AND HER
12 WATER BROKE AND SHE GOT A COMPOUND FRACTURE IN THE LOWER
13 LEG/ANKLE. AS A RESULT OF THE WATER BREAKING MY SON WAS BORN 3 DAYS
14 LATER 7 WEEKS PREMATURE. AS FOR WHAT WAS DONE TO CORRECT THE
15 PROBLEM I'M HOPING IT WILL AT LEAST BE INVESTIGATED TO MAKE SURE THIS
16 IS NOT A SYSTEMIC PROBLEM (I.E., SOFTWARE SCREWUP SOMETHING NOT
17 HOOKED UP RIGHT IN THE AIRBAG SYSTEM ETC).”

18 h. NHTSA complaint #10115806 dated Thursday, March 24, 2005, reported
19 an accident on Thursday, March 24, 2005 involving a 2002 CHEVROLET SILVERADO in
20 Claremore, OK. The complaint states: “A PIECE OF FURNITURE WAS LOCATED IN THE
21 MIDDLE OF THE HIGHWAY WHILE DRIVING, CAUSING THE DRIVER TO HIT THE
22 FURNITURE. DRIVER LOST CONTROL OF A VEHICLE, AND IT CRASHED INTO A
23 CONCRETE WALL. DRIVER'S SIDE SEAT BELT FAILED, AND **THE AIRBAGS DID**
24 **NOT DEPLOY.**”

25 i. NHTSA complaint #10158090 dated Tuesday, May 23, 2006, reported an
26 accident on Sunday, February 26, 2006 involving a 2004 CHEVROLET TRAILBLAZER in
27 Fayetteville, NC. The complaint states: “DT*: THE CONTACT STATED WHILE DRIVING 50
28 MPH THE VEHICLE WAS INVOLVED IN A HEAD ON COLLISION WITH ANOTHER

1 VEHICLE. THE VEHICLE CONTINUED MOVING AND STOPPED BY COLLIDING WITH
 2 A STORE SIGN. **THE AIR BAGS DID NOT DEPLOY** AND SEAT BELTS WERE WORN . .
 3 . THE INSURANCE COMPANY DETERMINED THE VEHICLE WAS TOTALED DUE TO
 4 THE ACCIDENT. THE DEALER DOES NOT HAVE THE MEANS TO TEST FOR AIR BAG
 5 NON-DEPLOYMENT. UPDATED 1/24/2007 - *NM”

6 j. NHTSA complaint #10161658 dated Thursday, July 6, 2006, reported an
 7 accident on Saturday, June 3, 2006 involving a 1999 CHEVROLET BLAZER in Ludlow, MA.
 8 The complaint states in part: “CHEVY DRIVER HIT A CAR IN HER LANE FIRST, THEN
 9 RICOCHETED HEAD ON INTO A TREE. **NEITHER TIME DID AIRBAGS DEPLOY.**
 10 *TT”

11 k. NHTSA complaint #10163811 dated Friday, July 28, 2006, reported an
 12 accident on Thursday, July 20, 2006 involving a 2000 ISUZU RODEO in Nederland, TX. The
 13 complaint states: “A GIRL RAN A RED LIGHT AND I HIT HER IN THE PASSENGER SIDE
 14 OF HER CAR HEAD ON WITH MY 2000 ISUZU RODEO. IT WAS A FULL FRONTAL
 15 COLLISION FOR ME AND MY CHILDREN. LUCKILY, WE ARE ALWAYS BUCKLED UP
 16 BECAUSE **NONE OF MY AIRBAGS DEPLOYED AT ALL.** THE OTHER CAR WAS
 17 GOING ABOUT 60 MPH AND HER AIRBAG DEPLOYED WHEN I HIT HER BUT MINE
 18 DID NOT. LUCKILY, MY CHILDREN WERE NOT HURT BADLY BUT
 19 UNFORTUNATELY, I SUSTAINED NECK, BACK AND KNEE INJURIES. I WAS AND
 20 STILL AM VERY UPSET THAT MY AIRBAGS FAILED. EVEN THE OWNER OF THE
 21 BODY SHOP I USE WAS IN SHOCK THAT THEY DID NOT DEPLOY AS THE IMPACT
 22 WAS ENOUGH TO SPLIT THE FRAME OF MY RODEO AND TOTAL IT OUT . . . THANK
 23 YOU FOR YOUR TIME, I HOPE I CAN HELP ANOTHER FAMILY FROM GETTING
 24 INJURED.”

25 l. NHTSA complaint #10217793 dated Tuesday, February 12, 2008, reported
 26 an accident on Thursday, February 7, 2008 involving a 2006 CHEVROLET TRAILBLAZER in
 27 Lakewood, OH. The complaint states: “A 2006 CHEVY TRAILBLAZER TRAVELING OVER
 28 THE SPEED LIMIT ON MY STREET CRASHED INTO A TREE, A PARKED CAR, AND

1 THEN CONTINUED TO ROLL OVER ACROSS MY FRONT LAWN, LANDING
 2 SIDEWAYS AFTER FLIPPING SEVERAL TIMES. THE OCCUPANTS WERE SEVERELY
 3 INJURED. **NO AIRBAGS DEPLOYED DURING THE CRASH.** THE DRIVER OF THE
 4 VEHICLE IS IN ICU NEEDING FACIAL RECONSTRUCTIVE SURGERY. *TR”

5 m. NHTSA complaint #10221319 dated Saturday, March 15, 2008, reported
 6 an accident on Thursday, February 21, 2008 involving a 2005 CHEVROLET TRAILBLAZER in
 7 Clay, NY. The complaint states: “I WAS DRIVING ON A 2 LANE ROAD GOING 45MPH. A
 8 CAR WAS FOLLOWING CLOSE BEHIND ME SO I WENT TO GET INTO RIGHT LANE
 9 AND MY TRUCK DID 5 360 AND HIT 3 TREES HEAD ON AND **AIR BAG NEVER**
 10 **DEPLOYED.** *TR”

11 n. NHTSA complaint #10263896 dated Wednesday, April 1, 2009, reported
 12 an accident on Thursday, March 26, 2009 involving a 2002 CHEVROLET TRAILBLAZER in
 13 Elizabeth, NJ. The complaint states: “I WAS IN A CAR ACCIDENT, WHERE I WAS
 14 TRAVELING AT ABOUT 35 MPH. AN AGGRESSIVE DRIVER SPEED AROUND ME AND
 15 CUT ME OFF AND THAN STOMPED ON THIS BRAKES IN FRONT OF ME. DUE TO
 16 THAT I SWERVED TO MISS HIM CLIPPING HIS RIGHT BACK LIGHT AD BUMPER
 17 WITH MY LEFT HEADLIGHT AND BUMPER. AS I WAS SWERVING I HIT A TREE JUST
 18 ABOUT DEAD ON WITH MY CAR . . . I HIT THE TREE AT A SPEED OF ABOUT 28-30
 19 MPH. AFTER INITIAL IMPACT I WAS RUSHED TO THE HOSPITAL DUE TO
 20 UNCONSCIOUS AND FACIAL CONTUSIONS. DURING THE FIRST MOMENTS AFTER
 21 THE ACCIDENT, ONE OF THE FIRST THINGS OFFICERS, EMTS AND WITNESSES SAID
 22 WAS “**I CAN'T BELIEVE THE AIRBAGS DIDN'T GO OFF.**” IN THE RECENT DAYS
 23 AFTER THE ACCIDENT I HAVE HAD SEVERAL MECHANICS AND SUCH APPRAISE
 24 THE CAR, THE ONE COMMON THEME THEY ALL SHARE IS THAT THEY SUSPECT
 25 THERE MIGHT NOT BE AN AIRBAG WHERE IT BELONGS. OR THE LACK THERE OF.
 26 *TR”

27 o. NHTSA complaint #10463248 dated Wednesday, June 27, 2012, reported
 28 an accident on Friday, July 15, 2011 involving a 2005 GMC in Richmond, VA. The complaint

1 states: "THE CONTACT STATED WHILE DRIVING 55 MPH, HE CRASHED INTO A TREE.
 2 **THE AIR BAGS FAILED TO DEPLOY . . .** A POLICE REPORT WAS FILED. THE
 3 MANUFACTURER WAS MADE AWARE OF THE FAILURE; HOWEVER, THEY
 4 PROVIDED NO ASSISTANCE . . . THE CONSUMER'S VEHICLE WAS DAMAGED WHEN
 5 HE TRIED TO AVOID HITTING THE VEHICLE BY SWERVING SIDEWAYS AND
 6 SLIDING INTO THE GRASS. HE TRIED STOPPING THE VEHICLE WHILE IT WAS STILL
 7 ON THE PAVEMENT BUT HE INEVITABLY RAN INTO THE DITCH AND FLEW
 8 AIRBORNE INTO A TREE, AND THE TRUCK OVERTURNED."

9 p. NHTSA complaint #10524151 dated Wednesday, July 10, 2013, reported
 10 an accident on Thursday, May 30, 2013 involving a 2006 CHEVROLET TRAILBLAZER in
 11 Mansfield, OH. The complaint states: "THIS COMPLAINT IS BEING FILED ON BEHALF OF
 12 THE VEHICLE OWNER AND DRIVER. THIS CHEVY TRAILBLAZER WAS INVOLVED
 13 IN A TWO VEHICLE, DOUBLE FATAL CRASH. THE FRONT OF THE TRAILBLAZER
 14 STRUCK THE DRIVER'S SIDE DOOR OF A CAVALIER THAT FAILED TO YIELD FROM
 15 A STOP SIGN. THE TRAILBLAZER STAYED CONNECTED WITH THE CAVALIER,
 16 FORCING IT OFF THE LEFT SIDE OF THE ROADWAY AND INTO A LARGE TREE.
 17 BOTH OCCUPANTS IN THE CAVALIER WERE FATALLY INJURED. **THE FRONT**
 18 **AIRBAGS DID NOT DEPLOY ON THE TRAILBLAZER** AND NO EVENT WAS
 19 RECORDED ON THE AIRBAG CONTROL MODULE. *TR"

20 q. NHTSA complaint #10537593 dated Tuesday, August 27, 2013, reported
 21 an accident on Tuesday, August 13, 2013 involving a 2003 CHEVROLET BLAZER in Harrison
 22 Township, MI. The complaint states: "I WAS TRAVELING SOUTHBOUND WHEN I
 23 EXPERIENCED A SEIZURE AND LOST CONTROL OF MY VEHICLE. I PROCEEDED TO
 24 VEER TO THE LEFT WHERE I CLIPPED SEVERAL CARS THAT WERE HEADED
 25 NORTHBOUND . . . I THEN PROCEEDED OVER A TREE LAWN AND INTO A PARKING
 26 LOT. I HIT A DODGE RAM PICKUP WITH THE RIGHT FRONT CORNER OF MY
 27 VEHICLE AND PUSHED THAT VEHICLE INTO ANOTHER PARKED CAR THAT WAS
 28 NEXT TO IT. BOTH VEHICLES ENDED UP SIDEWAYS AND MY VEHICLE ENDED UP

1 SPUN AROUND 180 DEGREES . . . THE JAWS OF LIFE WERE USED TO EXTRACT ME
 2 FROM MY VEHICLE. I WAS TAKEN TO A LOCAL HOSPITAL WHERE IT WAS
 3 DETERMINED THAT I SUFFERED BURST FRACTURES OF L1, L2, AND L3. I ALSO
 4 SUFFERED AN EVULSION FRACTURE OF MY LEFT ANKLE. THE POLICE REPORT
 5 STATES THAT I WAS TRAVELLING AT A HIGH RATE OF SPEED AND THAT THE
 6 VEHICLES WHICH WERE NORTHBOUND WERE JUST CLIPPED. **THE AIRBAGS ARE**
 7 **BOTH STILL WITHIN THEIR CASES AS NEITHER DEPLOYED** . . . THE INSURANCE
 8 INVESTIGATOR EVEN EXPRESSED TO MY WIFE THAT HE WAS SURPRISED THAT
 9 THE AIR BAG DID NOT DEPLOY.”

10 r. NHTSA complaint #10550276 dated Wednesday, October 30, 2013,
 11 reported an accident on Monday, October 28, 2013 involving a 2006 CHEVROLET
 12 TRAILBLAZER in Neihart, MT. The complaint states: “TL* THE CONTACT OWNS A 2006
 13 CHEVROLET TRAILBLAZER. THE CONTACT STATED THAT WHILE DRIVING
 14 APPROXIMATELY 35 MPH, SHE LOST CONTROL OF THE VEHICLE WHILE DRIVING
 15 IN SNOWY WEATHER. THE VEHICLE NOSE DIVED INTO AN EMBANKMENT AND
 16 THEN CRASHED INTO A BOULDER. **THE AIR BAGS FAILED TO DEPLOY.** THE
 17 CONTACT WAS TRANSPORTED TO THE HOSPITAL VIA AMBULANCE FOR
 18 TREATMENT OF A CONCUSSION AND BRUISING. THE FRONT PASSENGER WAS
 19 ALSO INJURED AND SUSTAINED BRUISING. THE VEHICLE WAS DESTROYED. THE
 20 MANUFACTURER WAS MADE AWARE OF THE FAILURE.”

21 s. NHTSA complaint #10574295 dated Sunday, March 23, 2014, reported an
 22 accident on Friday, February 21, 2014 involving a 2010 GMC TERRAIN in Saint Joe, IN. The
 23 complaint states: “INVOLVED IN A 21 CAR PILE UP IN THE UPPER PENINSULA DURING
 24 A COMPLETE WHITE OUT. WE WERE ONLY TRAVELING APPROXIMATELY 25
 25 MILES PER HOUR BUT, WE DID HAVE SERIOUS IMPACT IN THE FRONT, AFTER
 26 HITTING A TRAILER AND ALSO SERIOUS IMPACT FROM BEHIND WHEN HIT BY A
 27 TRUCK AND TRAILER. **NO AIRBAGS DEPLOYED.** THE TRUCK TRAVELING AHEAD
 28 OF US, THAT WE HIT, THE AIRBAGS DID DEPLOY. MY FATHER AND BROTHER,

1 WHO WERE ALSO BOTH DRIVING CHEVY TRUCKS, AND ALSO HAD SERIOUS
 2 FRONT END DAMAGE DURING THE SAME ACCIDENT, THEIR AIRBAGS DID NOT
 3 DEPLOY EITHER. *TR”

4 t. NHTSA complaint #10576031 dated Monday, March 31, 2014, reported an
 5 accident on Sunday, March 23, 2014 involving a 2012 CADILLAC SRX in Kaplan, LA. The
 6 complaint states: “I FELL ASLEEP WHILE DRIVING, JUMPED A LEVEE, RAN THROUGH
 7 A FENCE, AND WRECKED IN A GRASSY WATERY AREA. MY ENGINE WAS
 8 SMASHED, THE MOTOR MOUNT BROKE, AND MY TIRES ARE PUSHED BACK. MY
 9 **AIR BAGS DID NOT DEPLOY**. MY FACE HIT THE STEERING WHEEL AND MY NOSE
 10 IS BROKEN. I WOULD LIKE TO FIND OUT IF THERE IS ANY RECALLS ON THIS CAR.

11 *TR”

12 u. NHTSA complaint #10583703 dated Saturday, April 19, 2014, reported an
 13 accident on Thursday, March 13, 2014 involving a 2012 GMC TERRAIN in Moneta, VA. The
 14 complaint states: “I INADVERTENTLY VEERED OFF SIDE ROADWAY, (VA HIGHWAY
 15 220) COLLIDING WITH A TREE/ROADSIDE SHRUBS, ETC (WAS KNOCKED
 16 UNCONSCIOUS AS FOREHEAD HIT STEERING WHEEL ON INITIAL IMPACT).
 17 **AIRBAGS DID NOT DEPLOY** ALLOWING ME TO SUSTAIN A HEAD INJURY THAT
 18 KNOCKED ME UNCONSCIOUS... FOREHEAD WAS GASHED WITH SIGNIFICANT
 19 BLEEDING. I WAS TRANSPORTED BY AMBULANCE IN UNCONSCIOUS STATE.
 20 DAMAGE TO VEHICLE IS IN EXCESS OF \$8,000 SO FAR AS VEHICLE STILL IN
 21 REPAIR SHOP WITH MASSIVE FRONT END DAMAGE THAT AFFECTS STEERING
 22 LINKAGE, ETC. THE IMPACT OF VEHICLE AGAINST FOLIAGE, TREES SHRUBS,
 23 SHOULD HAVE FORCED AIR BAGS TO DEPLOY AND I BELIEVE THAT I WOULD NOT
 24 HAVE SUSTAINED A HEAD INJURY THAT RENDERED ME UNCONSCIOUS WITH
 25 MILD CONCUSSION AND COULD NOT CONTROL VEHICLE LEAVING ROADWAY.

26 *TR”

27 v. NHTSA complaint #10592423 dated Monday, May 19, 2014, reported an
 28 accident on Thursday, May 8, 2014 involving a 2003 CHEVROLET SILVERADO in

1 Burtonsville, MD. The complaint states: “TRUCK COLIDED WITH GUARD RAIL.
 2 BOUNCED OFF, HIT VEHICLE 1, THEN INTO VEHICLE 2 THEN STOPPED AFTER
 3 HITTING VEHICLE 3 A SEMI TRUCK. ALL DAMAGE WAS DONE TO FRONT OF THE
 4 CHEVY SILVERADO. **AT NO TIME DID THE AIRBAGS DEPLOY.**”

5 w. NHTSA complaint #10622016 dated Wednesday, August 13, 2014,
 6 reported an accident on Saturday, August 9, 2014 involving a 2012 CHEVROLET TAHOE in
 7 The Colony, TX. The complaint states: “WHILE TURNING LEFT (TAHOE) WITH A
 8 PROTECTED GREEN ARROW AT AN X-SHAPED INTERSECTION, VEHICLE (KIA
 9 SEDAN) AT FAULT FAILED TO YIELD AND ENTERED THE INTERSECTION AT
 10 SPEEDS UPWARDS OF 40 MPH FROM THE LEFT OF THE TAHOE. FRONT-IMPACT
 11 COLLISION OCCURRED . . . TAHOE STRUCK PASSENGER SIDE OF KIA SEDAN.
 12 TRAJECTORY OF IMPACT CAUSED DIRECTIONAL CHANGES IN UPWARDS OF 90*
 13 FOR BOTH VEHICLES; THE FORCE OF THE PRIMARY ACCIDENT DESCRIBED ABOVE
 14 ALSO CAUSED MENTIONED VEHICLES TO COLLIDE WITH LEFT REAR OF ANOTHER
 15 VEHICLE (HONDA SEDAN) . . . DUE TO THE FORCE OF IMPACT, FRONT & SIDE
 16 AIRBAGS DEPLOYED ON BOTH THE KIA SEDAN AND THE HONDA SEDAN, BUT
 17 **FAILED TO DEPLOY ON THE TAHOE . . . FORCE WAS SUCH THAT AFTER THE**
 18 COLLISION, TAHOE TRANSMISSION WAS IN DRIVE, BUT REMAINED AT A
 19 COMPLETE STOP. DAMAGE SUSTAINED ON THE TAHOE INCLUDE FRONT-END
 20 BODY DAMAGE, ENGINE DAMAGE (VEHICLE REQUIRED TOWING AND WAS
 21 INOPERABLE), AND FRAME DAMAGE, AT A MINIMUM . . . MULTIPLE FIRST-
 22 RESPONDERS COMMENTED ON THE ODDITY THAT, GIVEN THE DAMAGE
 23 SUSTAINED BY THE TAHOE AND THE VELOCITY AT IMPACT, THE AIRBAGS
 24 DEPLOYED ON ALL VEHICLES BUT THE TAHOE. *TR”

25 x. NHTSA complaint #10641399 dated Saturday, October 4, 2014, reported
 26 an accident on Tuesday, June 7, 2011 involving a 2002 CHEVROLET TAHOE in Cheney, WA.
 27 The complaint states: “THE CONTACT STATED THAT WHILE THE DRIVER WAS
 28 DRIVING AT 45 MPH AND ATTEMPTED TO AVOID A CRASH WITH ANOTHER

1 VEHICLE. AS A RESULT, THE DRIVER CRASHED INTO A GUARDRAIL AND **THE AIR**
 2 **BAGS FAILED TO DEPLOY.** A POLICE REPORT WAS FILED. THE CONTACT WAS
 3 TAKEN TO A HOSPITAL AND SUSTAINED INJURIES TO THE RIBS, THE COLLAR
 4 BONES, A BRAIN TRAUMA AND A COLLAPSED LUNG. THE DRIVER SUFFERED
 5 FROM FATAL INJURIES.”

6 y. NHTSA complaint #10767586 dated Tuesday, September 22, 2015,
 7 reported an accident on Saturday, August 1, 2015 involving a 2004 CHEVROLET
 8 TRAILBLAZER in Tallahassee, FL. The complaint states: “MY MOTHER WAS INVOLVED
 9 IN A 1 CAR ACCIDENT ON BAUM RD LOCATED IN TALLAHASSEE, FL. SHE WAS THE
 10 ONLY PASSENGER DETERMINED TO BE IN THE VEHICLE AT THE TIME OF THE
 11 ACCIDENT. ACCORDING TO THE CRASH REPORT, D1 (DRIVER ONE) WAS
 12 TRAVELING WESTBOUND ON BAUM RD GOING THE NORMAL POSTED SPEED OF
 13 55MPH, WHEN SHE VEERED TOWARDS THE CENTER OF THE RD AND SUDDENLY
 14 TURNED RIGHT VEERING OF THE RIGHT SHOULDER OF THE RD AND STRIKING
 15 SEVERAL TREES ON THE DRIVERS SIDE AND FRONT END . . . WHEN I WENT TO
 16 RETRIEVE MY MOTHERS THINGS FROM HER TRAILBLAZER, I NOTICED THAT **NO**
 17 **AIR BAGS HAD DEPLOYED.** AND AS FAST AS MY MOM WAS GOING AND THE
 18 TYPE OF IMPACT & DAMAGE HER SUV SUSTAINED, I WOULD THINK AND HOPE
 19 THE AIRBAGS WOULD DEPLOY IN THIS TYPE OF ACCIDENT, THUS PREVENTING
 20 SERIOUS INJURY OR DEATH. MY MOM WAS NOT SO LUCKY, AND MYSELF AND MY
 21 FAMILY HAVE ENDURED GREAT PAIN FROM LOOSING HER SO SUDDENLY.”

22 z. NHTSA complaint #10907149 dated Friday, September 16, 2016, reported
 23 an accident on Thursday, September 1, 2016 involving a 2006 CADILLAC SRX in Happy
 24 Valley, OR. The complaint states: “THE VEHICLE HIT A CURB AND DROVE INTO A
 25 BUILDING. **THE AIR BAGS FAILED TO DEPLOY.** THE CONTACT SUSTAINED
 26 INJURIES THAT REQUIRED MEDICAL ATTENTION . . . THE MANUFACTURER WAS
 27 NOTIFIED OF THE FAILURE.”

1 135. GM knew or had reason to know about these complaints, which are publicly
2 available on NHTSA's website. Indeed, many complaints explicitly state that GM was directly
3 informed of and/or investigated these suspicious accidents. For example:

4 a. A complaint about an August 2018 accident in a 2008 GMC Acadia details
5 that the airbags and seatbelt pretensioners did not deploy after the complainant's wife fell asleep
6 at the wheel and struck a utility pole and then a large dirt embankment—which caused her to “hit
7 the steering column so hard . . . it broke the column and broke her sternum,” and caused the
8 granddaughter in the passenger seat to break her back in two places. It continues that “GENERAL
9 MOTORS . . . SENT A MAN TO DOWNLOAD THE COMPUTER INFORMATION THEY
10 SENT ME A COPY OF THE INFO AND LATER CONTACTED ME SAYING THE INFO
11 SHOWED EVERYTHING WAS WORKING PROPERLY.” NHTSA complaint #11066850.

12 b. After a July 2014 head on collision at 50 MPH where the airbags did not
13 deploy in a 2007 Silverado, totaling the vehicle, another driver was “TOLD BY GM THAT
14 CRASH DID NOT MEET CRITERIA FOR DEPLOYMENT.” The driver expressed skepticism
15 about this response, and in the complaint, stated “A HEAD ON COLLISION AT 50 MPH THAT
16 TOTALED 2500 SERIES CHEVY TRUCK. HARD FOR ME TO BELIEVE . . . DO I NEED
17 TO [BE] CONCERNED?” NHTSA complaint #10608220.

18 c. Another driver reported on a May 2014 accident in a 2012 GMC Terrain in
19 Moneta, VA. The driver struck “something” head on after veering off the highway and proceeded
20 through trees and brush. They were knocked unconscious after hitting their head on the steering
21 wheel upon the first impact, as the airbags had failed to deploy. They were transported to a
22 hospital by ambulance and spent two days in inpatient care. The driver later “CONTACTED
23 GMC CORPORATE . . . TO ADVISE MY CONCERNS FOR SAFETY . . . RECEIVED A
24 FOLLOW UP TELEPHONE CALL FROM GMC REPRESENTATIVE . . . HE EXPRESSED
25 NO INTEREST IN MY COMPLAINT . . . REFUSED TO COMMENT ON MY STATEMENT
26 THAT AIR BAG FAILED TO DEPLOY RESULTING IN EXTENSIVE DAMAGE TO FRONT
27 OF VEHICLE AND SUSTAINING A HEAD INJURY AS NO BAG DEPLOYED . . . I WAS
28

1 ADVISED THAT GMC HAD NO FURTHER INTEREST IN THIS MATTER AND WOULD
2 NOT EVALUATE MY SAFETY CONCERNS.” NHTSA complaint #10588334.

3 d. After a July 2012 accident involving a 2012 GMC Terrain in San
4 Clemente, CA, in which the Terrain was hit multiple times in an intersection in the driver’s front
5 end, but no airbags deployed, resulting in whiplash and contusions to the driver, a GM
6 representative responded to a complaint lodged by the driver’s parents and stated that there was
7 “NO NEED FOR DEPLOYMENT” because it was a “LOW THRESHOLD EVENT.” NHTSA
8 complaint #10466384.

9 e. After hitting a patch of black ice at 58 MPH in a Chevrolet Silverado in
10 January 2008, another complainant described that they lost control of the vehicle, ran off the road,
11 crashed into a telephone pole and ultimately into a frozen embankment. The airbags did not
12 deploy, causing the driver to hit the steering wheel. As the complainant relates, they “FILED A
13 COMPLAINT WITH THE MANUFACTURER, BUT THE COMPLAINT WAS DENIED. THE
14 MANUFACTURER WAS UNABLE TO DIAGNOSE THE VEHICLE; HOWEVER, AFTER
15 INSPECTION OF THE VEHICLE, THE MANUFACTURER CONFIRMED THAT THE AIR
16 BAGS WERE ENABLED AT THE TIME OF IMPACT. THEY DID NOT GIVE AN
17 EXPLANATION FOR THE DEPLOYMENT FAILURE.” NHTSA complaint #10238395.

18 f. In a report about a March 2006 accident involving a 2005 Cadillac
19 Escalade in Louisville, KY, the complainant describes that after none of the airbags deployed in a
20 front end collision in their 4-week old vehicle, they “CALLED CADILLAC CUSTOMER
21 SERVICE AND WAS GIVEN AN AIRBAG HISTORY LESSON VIA TELEPHONE FROM
22 SOMEONE THAT HAD NEVER SEEN MY VEHICLE OR INSPECTED IT FOR DAMAGE
23 AFTER THE ACCIDENT. AT THE END OF OUR CONVERSATION I WAS TOLD ALL
24 WAS OK, NONE OF MY AIRBAGS SHOULD HAVE DEPLOYED AND NOT TO WORRY
25 ABOUT IT. THE ENTIRE FRONT END OF MY VEHICLE WAS KNOCKED OFF, THE
26 FRAME HAS MULTIPLE CRACKS AND IS BENT AS A RESULT OF THE COLLISION
27 AND THE COLLISION CENTER IS 90% CERTAIN THE VEHICLE IS NOT REPAIRABLE.
28 *JB” NHTSA complaint #10152376.

g. After an August 2004 accident involving a 1999 Chevrolet Astro in Norfolk, VA in which the vehicle jumped a curb, struck a fire hydrant, and then struck a tree without the airbags deploying, the driver was taken by ambulance to the hospital for head and neck injuries. After the accident, the “CONSUMER CONTACTED THE MANUFACTURER AND A REPRESENTATIVE CAME DOWN TO MEET WITH THE DEALER AND CONSUMER. THE REPRESENTATIVE INFORMED CONSUMER THAT THE VEHICLE WAS FUNCTIONING AS DESIGNED.” NHTSA complaint # 10087718.

h. Another driver contacted GM after the airbags did not deploy in a February 2004 front end collision at 25-30 MPH in their 2000 Isuzu Rodeo in Westwood, NJ. “THE CONSUMER CONTACTED THE MANUFACTURER ABOUT THE AIR BAGS BUT THE REPRESENTATIVE DID NOT SEEM TO BE TOO CONCERNED ABOUT THE SITUATION.” NHTSA complaint #10087550.

i. Another driver described a head on collision at 39 MPH in their 2002 Chevrolet Tahoe in which the airbags did not deploy and the seatbelts did not tighten. The driver hit their head on the steering wheel, knocking them unconscious. A readout from the vehicle’s computer showed the seatbelts were in working order, and GM responded by sending a representative to inspect the vehicle in person. The complainant was awaiting a response from GM at the time of the report. NHTSA complaint #10353935.

136. More than eight hundred similar complaints—i.e., frontal crashes in the Class Vehicles with airbag and seatbelt failures following multiple impacts, or, potentially long-soft frontal impacts—are attached hereto as Exhibit A.⁵²⁵³ These accidents are relevant, and suspicious, because they include hallmarks of the SDM Calibration Defect (airbag and seatbelt

⁵²⁵³ The accidents in the preceding paragraph and Exhibit A include data for Class Vehicles in model years 1999-2014. In the interest of efficiency, Plaintiffs have not supplemented the accidents included in Exhibit A from the previously filed ~~version~~ versions with ~~the first amended complaint~~ their prior pleadings, but note that significant numbers of similar consumer reports of multi-impact and front-end impact accidents with airbag and seatbelt failures have continued to accrue in the NHTSA database in model years 1999-2014, as well as later model years, in the time since Exhibit A was originally prepared in 2021. Plaintiffs are prepared to submit supplemental examples of such incidents at the Court’s request.

failures), under the very crash conditions where it arises, and in the specific population of vehicles Plaintiffs allege to be impacted.

137. In addition to these consumer complaints, a separate, public dataset from NHTSA, the Fatality Analysis Reporting System (“FARS”) provides a nationwide census of crashes that resulted in fatal injuries. While the complaints outlined above are reported to NHTSA by consumers and can include any type of complaint or incident, FARS data is reported by state agencies responsible for monitoring all qualifying fatal crashes in their states. To be included in FARS data, a crash must involve a motor vehicle traveling on a public road and result in the death of a person in one or more of the vehicles involved in the crash within 30 days of the crash. The dataset collects information on over 100 different data elements that characterize the crash, the vehicles, and the people involved—including whether or not the airbags deployed.

138. NHTSA’s FARS dataset also reveals a recurring pattern of suspicious nondeployments during frontal crashes (i.e., the crash dynamics that can implicate the SDM Calibration Defect) and reinforces the extremely high stakes of such incidents. From 1999 to present, FARS data reflects at least 1,946 frontal crashes where the airbags did not deploy in a Class Vehicle—1,167 of which occurred in 2009 or later, after New GM was formed. This same data reflects that at least 1,298 individual occupants (drivers or passengers) in a Class Vehicle were injured or killed in these crashes.

D. Despite its knowledge, GM misrepresented and concealed important information about the SDM Calibration Defect and Class Vehicle safety.

139. For many consumers, including Plaintiffs, safety is one of the most important factors when buying or leasing a vehicle. GM capitalized on this fact in advertising and other consumer-facing representations about the Class Vehicles and touted the safety of the Class Vehicles in national marketing campaigns.

140. In nationwide advertisement campaigns and promotional materials, GM maintained that the Class Vehicles were safe and reliable, and it did not correct representations about the Class Vehicles’ safety and reliability made by Old GM in the past. Instead, GM has repeatedly touted the Class Vehicles’ passenger safety systems and assured consumers they could

1 be relied upon to activate the airbags and seatbelts during a crash. These representations are false
 2 and misleading because of what they fail to say; GM uniformly failed to disclose that the SDM
 3 Calibration Defect could—at the worst possible moment—prevent the airbags and seatbelts from
 4 activating.

5 141. Plaintiffs and Class members, directly or indirectly, were exposed to these
 6 advertisements and promotional materials prior to purchasing or leasing their Class Vehicles. The
 7 misleading statements about Class Vehicles’ safety in GM’s advertisements and promotional
 8 materials, as well as GM’s omission of the truth about the SDM Calibration Defect, influenced
 9 Plaintiffs and Class members’ decisions to purchase or lease Class Vehicles. If GM had instead
 10 chosen to disclose the truth about the SDM Calibration Defect, Plaintiffs and Class members
 11 would have seen those disclosures. Indeed, Plaintiffs would have had multiple opportunities to
 12 receive information about the SDM Calibration Defect if GM chose to disclose it, including at
 13 dealerships, on GM’s website, in radio or television advertisements, brochures, press releases or
 14 in other promotional materials, as well as in news media reports that would likely follow from the
 15 revelation of a serious safety defect in millions of GM vehicles.

16 **1. Labels and window stickers on the Class Vehicles stated that they were**
 17 **equipped with working airbags and seatbelts and failed to disclose the**
 18 **SDM Calibration Defect.**

19 142. To sell vehicles in the United States, GM was required to “certify to the distributor
 20 or dealer at delivery that the vehicle or equipment complies with applicable motor vehicle safety
 21 standards prescribed” by NHTSA under Chapter 301 of Title 49 of the U.S. Code. GM “may not
 22 issue the certificate if, in exercising reasonable care,” they have “reason to know the certificate is
 23 false or misleading in a material respect.” 49 U.S.C. § 30115; *see also* 49 U.S.C. § 30112.

24 143. Because “[c]ertification of a vehicle must be shown by a label permanently fixed
 25 to the vehicle,” all Class Vehicles have a permanent label certifying compliance with the safety
 26 regulations prescribed by NHTSA. Since all the Class Vehicles are passenger vehicles, the
 27 permanent label must state: “This vehicle conforms to all applicable Federal motor vehicle safety,
 28 bumper, and theft prevention standards in effect on the date of manufacture shown above.” 49
 C.F.R. § 567.4(g)(5).

144. These labels were false and misleading because they failed to warn consumers about the risk that the SDM would fail during a frontal crash, and instead indicated that the passenger safety system would function properly. *See* 49 C.F.R. § 571.208 (S4.1.5.4, S4.1.5.5) (Federal motor vehicle safety standards requiring Occupant Restraint Systems with airbags and seatbelts).

145. Vehicle manufacturers have a duty to disclose known safety defects to the public and to NHTSA. When a vehicle manufacturer learns of a safety defect, federal law requires it to disclose the defect to NHTSA and to the owners, purchasers, and dealers of the vehicle. 49 U.S.C. § 30118(c). Indeed, GM Parent acknowledges these obligations in its public SEC filings. In its Form 10-K for fiscal year 2019, GM Parent states: “If we or NHTSA determine that either a vehicle or vehicle equipment does not comply with a safety standard or if a vehicle defect creates an unreasonable safety risk, the manufacturer is required to notify owners and provide a remedy.”

146. The interiors of the Class Vehicles also contain prominent labels that alert the driver and passengers to the vehicle’s airbag system. For example, steering wheels and passenger dashboards typically have labels identifying the airbag and safety restraint system (or “SRS”).

147. GM was also specifically required by law to include in their vehicles warning labels that alerted consumers of the need to perform airbag maintenance. For example, S4.5.1 of 49 C.F.R. § 571.208 states:

Air bag maintenance or replacement information. If the vehicle manufacturer recommends periodic maintenance or replacement of an inflatable restraint system, as that term is defined in S4.1.5.1(b) of this standard, installed in a vehicle, that vehicle shall be labeled with the recommended schedule for maintenance or replacement. The schedule shall be specified by month and year, or in terms of vehicle mileage, or by intervals measured from the date appearing on the vehicle certification label provided pursuant to 49 CFR Part 567. The label shall be permanently affixed to the vehicle within the passenger compartment and lettered in English in block capital and numerals not less than three thirty-seconds of an inch high. This label may be combined with the label required by S4.5.1(b) of this standard to appear on the sun visor.

[illegible]

~~2730953.6~~-2820476.3

151. As demonstrated by these examples, Monroney labels uniformly assured consumers that the Class Vehicles had working and safe airbags and seatbelts. This information would have suggested to any reasonable consumer that the passenger safety system did not suffer from a defect and would perform its intended function of activating the seatbelts and airbags when needed during a frontal collision.

2. **GM published owners' manuals for the Class Vehicles that detailed their safety features but did not disclose the SDM Calibration Defect.**

152. GM (and Old GM before it) published owners' manuals for each of the Class Vehicles, and distributed and made them available throughout the United States. These manuals were directed at consumers and included misleading statements regarding seatbelts, airbags, and passenger safety systems. These statements uniformly omitted any warning to consumers that the SDM could ~~effectively~~ shut off too early during a crash ~~after just 45 milliseconds~~, or that the airbags and seatbelt pretensioners may not deploy when expected.

153. Representative examples of statements from owners' manuals with materially misleading omissions concerning the effectiveness of their airbags follow in the paragraphs below.

154. The manual for the 2002 Cadillac Escalade provides extensive detail about the vehicle's airbags, including the below details and images. In addition to explaining the types of airbags and where they are located, the manual specifically alerts consumers that the airbags "are designed to inflate in moderate to severe frontal or near-frontal crashes" where "the impact speed is above the system's designed 'threshold level.'" As to frontal airbags, it explains that they have been "designed to help reduce the risk of injury from the force of an inflating airbag."

Supplemental Restraint Systems (SRS)

This part explains the frontal and side impact Supplemental Restraint Systems (SRS) or air bag systems.

Your vehicle has four air bags -- a frontal air bag for the driver, another frontal air bag for the right front passenger, a side impact air bag for the driver, and another side impact air bag for the right front passenger.

Frontal air bags are designed to help reduce the risk of injury from the force of an inflating frontal air bag. But these air bags must inflate very quickly to do their job and comply with federal regulations.

When should an air bag inflate?

The driver's and right front passenger's frontal air bags are designed to inflate in moderate to severe frontal or near-frontal crashes. But they are designed to inflate only if the impact speed is above the system's designed "threshold level."

If your vehicle goes straight into a wall that doesn't move or deform, the threshold level is about 9 to 16 mph (14 to 26 km/h). The threshold level can vary, however, with specific vehicle design, so that it can be somewhat above or below this range.

If your vehicle strikes something that will move or deform, such as a parked car, the threshold level will be higher. The driver's and right front passenger's frontal air bags are not designed to inflate in rollovers, side impacts, or rear impacts, because inflation would not help the occupant.

How the Air Bag Systems Work

Where are the air bags?



The driver's frontal air bag is in the middle of the steering wheel.



The right front passenger's frontal air bag is in the instrument panel on the passenger's side.

The driver's side impact air bag is in the side of the driver's seatback closest to the door.

How the Air Bag Systems Work

Where are the air bags?



The driver's frontal air bag is in the middle of the steering wheel.



The right front passenger's frontal air bag is in the instrument panel on the passenger's side.

The driver's side impact air bag is in the side of the driver's seatback closest to the door.

When Should an Airbag Inflate?

Frontal airbags are designed to inflate in moderate to severe frontal or near-frontal crashes to help reduce the potential for severe injuries mainly to the driver's or right front passenger's head and chest. However, they are only designed to inflate if the impact exceeds a predetermined deployment threshold. Deployment thresholds are used to predict how severe a crash is likely to be in time for the airbags to inflate and help restrain the occupants.

Whether the frontal airbags will or should deploy is not based on how fast your vehicle is traveling. It depends largely on what you hit, the direction of the impact, and how quickly your vehicle slows down.

All of the airbags in the vehicle will have the word AIRBAG embossed in the trim or on an attached label near the deployment opening.

For frontal airbags, the word AIRBAG will appear on the middle part of the steering wheel for the driver and on the instrument panel for the right front passenger.

With seat-mounted side impact airbags, the word AIRBAG will appear on the side of the seatback closest to the door.

With roof-rail airbags, the word AIRBAG will appear along the headliner or trim.

Airbags are designed to supplement the protection provided by safety belts. Even though today's airbags are also designed to help reduce the risk of injury from the force of an inflating bag, all airbags must inflate very quickly to do their job.

Airbag System

The vehicle has the following airbags:

- A frontal airbag for the driver.
- A frontal airbag for the right front passenger.
- A seat-mounted side impact airbag for the driver.
- A seat-mounted side impact airbag for the right front passenger.
- A roof-rail airbag for the driver, passenger seated directly behind the driver, and the third row outboard passenger position.
- A roof-rail airbag for the right front passenger, passenger seated directly behind the right front passenger, and the third row outboard passenger position.

155. The manuals for the 2009 Chevy Traverse and 2010 Buick Enclave include similar details and images. Like the manual for the 2002 Cadillac Escalade, they also assure consumers that the vehicle's airbags are "designed to help reduce the risk of injury from the force of an inflating bag" and, thus, that the aggressive deployment problems that plagued first-generation airbags had been alleviated. It also assures that the frontal airbags have been "designed to inflate

in moderate to severe frontal crashes to help reduce the potential for severe injuries....” It continues that airbag “deployment thresholds are used to predict how severe a crash is likely to be in time for the airbags to inflate and help restrain the occupants.” While it provides very specific detail about the way the passenger safety systems should function, the manual notably fails to say that the deployment thresholds are wholly and intentionally ignored ~~just 45 milliseconds early on~~ into a crash sequence, preventing the airbags and seatbelts from functioning when they need to.

156. The manual for the 2014 GMC Acadia provides additional detail about how the passenger safety system functions. It explains that “Airbags are designed to inflate if the impact exceeds the specific airbag system’s deployment thresholds.” Yet again, however, the manual does not indicate that the SDM and its sensors are rendered useless in multi-impact crashes that endure for longer than a specific, ~~45-millisecond time frame~~ aggressive cutoff imposed by GM.

Where Are the Airbags?



The driver frontal airbag is in the center of the steering wheel.



The front outboard passenger frontal airbag is in the passenger side instrument panel.



If the vehicle has a front center airbag, it is in the inboard side of the driver seatback.

When Should an Airbag Inflate?

This vehicle is equipped with airbags. See *Airbag System* on page 3-23. Airbags are designed to inflate if the impact exceeds the specific airbag system’s deployment threshold. Deployment thresholds are used to predict how severe a crash is likely to be in time for the airbags to inflate and help restrain the occupants. The vehicle has electronic sensors that help the airbag system determine the severity of the impact. Deployment thresholds can vary with specific vehicle design.

Frontal airbags are designed to inflate in moderate to severe frontal or near frontal crashes to help reduce the potential for severe injuries, mainly to the driver’s or front outboard passenger’s head and chest.

Whether the frontal airbags will or should inflate is not based primarily on how fast the vehicle is traveling.

It depends on what is hit, the direction of the impact, and how quickly the vehicle slows down.

Frontal airbags may inflate at different crash speeds depending on whether the vehicle hits an object straight on or at an angle, and whether the object is fixed or moving, rigid or deformable, narrow or wide.

Frontal airbags are not intended to inflate during vehicle rollovers, rear impacts, or many side impacts.

In addition, the vehicle has advanced technology frontal airbags. Advanced technology frontal airbags adjust the restraint according to crash severity.

The front center airbag, if equipped, is designed to inflate in moderate to severe side crashes depending upon the location of the impact, when either side of the vehicle is struck. In addition, the front center airbag is designed to inflate when the sensing system predicts that the vehicle is about to roll over on its

side. The front center airbag is not designed to inflate in frontal impacts, near frontal impacts, or rear impacts.

Seat-mounted side impact airbags are designed to inflate in moderate to severe side crashes depending on the location of the impact. Seat-mounted side impact airbags are not designed to inflate in frontal impacts, near frontal impacts, rollovers, or rear impacts.

A seat-mounted side impact airbag is designed to inflate on the side of the vehicle that is struck.

Roof-rail airbags are designed to inflate in moderate to severe side crashes depending on the location of the impact. In addition, these roof-rail airbags are designed to inflate during a rollover or in a severe frontal impact. Roof-rail airbags are not designed to inflate in rear impacts. Both roof-rail airbags will inflate when either side of the vehicle is struck, if the sensing

3. **GM marketed the Class Vehicles to be safe and reliable but failed to mention the SDM Calibration Defect.**

157. Like its other consumer-facing representations, GM's advertisements for the Class Vehicles left out a crucial part of the story. By uniformly omitting any information about the SDM Calibration Defect, GM misled consumers into believing that their airbags and seatbelts would function properly in a crash, despite its knowledge to the contrary.

158. A 2013 press release about the 2014 Chevy Silverado 1500, GMC Sierra, and Sierra Denali 1500 is further illustrative of GM's misleading statements about the Class Vehicles. Acknowledging that safety is "as important to truck buyers as it is to car buyers," Gay Kent, GM general director of Vehicle Safety and Crashworthiness, stated that the "Silverado and Sierra set a benchmark for pickup truck safety by offering a full array of advanced features designed to protect occupants before, during and after a collision." The press release noted the vehicle's "[s]ix standard air bags and 360-degree sensor system, including dual-stage frontal air bags, head-curtain side-impact air bags with rollover protect, and front outboard seat-mounted side-impact air bags."

159. Brochures and press releases for other Class Vehicles use similar language to send a misleading message of safety. Illustrative examples are listed below.

a. Beginning with the 1999 Chevy Blazer, GM promised to go "to the ends of the earth to bring you driving security," assuring "peace of mind" with its "mainstay features such as Next Generation driver and right-front-passenger airbags."

b. "Because safety and security are so important to your family," the brochure for the 2002 Chevy Astro reads, "Astro features a comprehensive system to help you feel secure while you're driving." Among other safety features, "[s]tandard driver and front-passenger air bags . . . [are] designed to give you peace of mind. Chevy Astro. It's the midsize van that's serious about safety and security."

c. The brochure for the 2006 GMC Yukon promises, "should the worst happen, your Yukon will protect you and your passengers with front and rear crush zones, a sturdy steel safety cage, up to four air bags and a host of other important safety features."

1 d. The brochure for the 2008 Buick Enclave explains that “[s]afety and
2 protection were top priorities in the design of the Enclave” and touts the vehicle’s “360°
3 perimeter safety system [that] will deploy the appropriate airbags.”

4 e. Promising “[f]eelings of security and confidence,” the brochure for the
5 2009 Chevy Equinox states the vehicle’s “dual-stage frontal and head-curtain side-impact air
6 bags” helped earn it “the highest possible government rating for frontal crash tests – five stars.”

7 f. Declaring that “[s]afety never goes out of style,” the brochure for the 2009
8 Chevy Traverse highlights the vehicle’s “five-star frontal and side-impact crash test ratings” and
9 its “six air bags that help protect all three rows of seating.”

10 g. A press release for the 2009 Cadillac Escalade ESV goes further,
11 proclaiming that the “Escalade is designed to be among the industry’s safest and most secure
12 vehicles, with numerous safety systems and crash-avoidance technologies.”

13 h. “Speaking of safety,” the brochure for the 2010 Buick Enclave reads,
14 “Enclave has earned an impressive five-star crash rating for both front and side impacts
15 Five-star rating is for the driver and front passenger seating positions in the frontal crash test and
16 for the front and rear seating positions in the side-impact crash test.”

17 i. The brochure for the 2010 GMC Terrain describes the vehicle as “the state
18 of the art in air bags” and contends that “[s]egment-best safety is anticipated, with features that
19 include . . . six standard air bags: dual frontal airbags; head curtain side air bags and pelvic/thorax
20 seat-mounted side airbags.”

21 j. The brochure for the 2010 Silverado assures that the “head of security
22 never goes off the clock,” boasting of a “five-star frontal crash test rating,” including through its
23 “driver and right-front passenger dual-stage airbags.”

24 k. A press release for the 2011 Cadillac Escalade Hybrid explains, “[f]ront-
25 image airbags for the driver and passenger have been designed to protect the head during a frontal
26 crash.”

27 l. According to the brochure for the 2011 Cadillac SRX, “[p]assenger safety
28 is a primary consideration throughout the engineering process.” If an incident occurs, “the SRX

1 looks out for you and yours,” with its “six standard airbags, including advanced, frontal dual-
 2 stage and seat mounted side-impact airbags for the driver and front-seat passenger, as well as
 3 first- and second- row outboard head-curtain airbags.”

4 m. Describing Buick’s “holistic[]” approach to safety, the brochure for the
 5 2012 Enclave proclaims, “Enclave’s approach to safety helps you and your companions feel safe
 6 and secure before, during and after your travels.” Inside the vehicle, “all rows have curtain side-
 7 impact air bags with rollover protection, along with driver and front-passenger side-impact and
 8 dual-stage airbags.”

9 n. In a 2013 press release announcing that NHTSA gave “its highest possible
 10 5-star Overall Score” to a number of Chevrolet vehicles, including the Traverse and the
 11 Silverado, Kent said “We design safety and crashworthiness into our vehicles very early in
 12 development.” He continued, “We are committed to offering advanced safety technologies on a
 13 broad range of models All of our vehicles are designed to provide continuous protection for
 14 customers before, during and after a crash.”

15 o. A press release for the 2013 Buick Enclave likewise publicized Buick’s
 16 safety record: “In 2012, every Buick model was named a Top Safety Pick by the Insurance
 17 Institute for Highway Safety, underscoring the brand’s commitment to safety leadership. The
 18 2013 builds on that distinction with the industry’s first front center side air bag – a standard
 19 feature.”

20 p. “With head curtain side-impact air bags reaching from the front to the third
 21 row of seating for outboard passengers,” the 2014 brochure for the GMC Yukon XL reads,
 22 “Yukon is engineered to help protect passengers regardless of where they’re seated.”

23 q. Claiming to “set[] the standard . . . in everything from safety to
 24 performance,” the brochure for the 2014 Cadillac Escalade touts the vehicle’s “eight standard
 25 airbags,” including “[d]ual-stage driver and front passenger, front-impact, Automatic Occupant
 26 Sensing System, driver and front passenger seat-mounted side-impact airbags for thorax and
 27 pelvic protection and head-curtain side-impact airbags with rollover protection for all outboard
 28 passenger rows.”

r. The brochure for the 2014 Buick Enclave promises that the vehicle has “your back, front and sides, proclaiming that “in an industry first, the standard driver’s seat side-mounted front center air bag adds another layer of protection by providing cushioning between you and your front passenger to help reduce injuries in side impacts.” The brochure includes the below picture, indicating that the airbags will function as expected.



160. Based on information and belief, every single Class Vehicle advertisement omitted any mention that the vehicles’ airbags and seatbelts could fail in a serious frontal collision due to the SDM Calibration Defect.

4. GM provided warranties to repair defects in the Class Vehicles and have not done so.

~~1. GM also provided Plaintiffs and Class members with an express warranty “to correct any vehicle defect, not slight noise, vibrations, or other normal characteristics of the vehicle related to materials or workmanship” in the Class Vehicles.~~

~~2. The warranty terms became part of the basis of the bargain when Plaintiffs and Class members purchased or leased their Class Vehicles.~~

1. ~~3.~~ Plaintiffs and each Class member have had sufficient direct dealings with either Defendants or their agents (including dealerships) to establish privity of contract between Defendants, on the one hand, and Plaintiffs and each Class member, on the other hand, as to the ~~express and~~ implied warranties described in the Claims for Relief below.

2. ~~4.~~ Nonetheless, privity is not required here because Plaintiffs and each Class member are intended third-party beneficiaries of contracts between Defendants and their dealers,

1 and of their implied warranties. The dealers were not intended to be the ultimate consumers of the
 2 Class Vehicles and have no rights under the warranty agreements provided with the Class
 3 Vehicles; the warranty agreements were designed for and intended to benefit consumers only.
 4 Finally, privity is also not required because the Class Vehicles are dangerous instrumentalities
 5 due to the safety defect in the SDM Calibration.

6 * * *

7 3. ~~5.~~ GM's deceptive actions harmed Plaintiffs and the Class. As a result of GM's
 8 unfair, deceptive, and/or fraudulent business practices, and failure to disclose that the Class
 9 Vehicles carried a dangerous safety defect that would cause the passenger safety systems to shut
 10 off during certain types of accidents, owners and lessees of the Class Vehicles have lost money
 11 and/or property.

12 **V. CLASS ACTION ALLEGATIONS**

13 4. This case is about GM's legal responsibility for its knowledge, conduct, and
 14 products. The proposed Class members' claims all derive directly from a single course of conduct
 15 by GM. The objective facts are the same for all Class members. Within each Count asserted by
 16 Plaintiffs on behalf of themselves and the proposed Class, the same legal standards govern.

17 5. Accordingly, Plaintiffs bring this lawsuit as a class action on their own behalf, and
 18 on behalf of all other persons similarly situated, as members of the proposed Class pursuant to
 19 Federal Rules of Civil Procedure 23(a), (b)(2), and/or (b)(3), and/or (c)(4). This action satisfies
 20 the numerosity, commonality, typicality, adequacy, predominance, and superiority requirements
 21 of those provisions. Certification of Plaintiffs' claims for class-wide treatment is appropriate
 22 because Plaintiffs can prove the elements of the claims on a class-wide basis using the same
 23 evidence as would be used in individual actions alleging the same claims.

24 **A. The Class Definition**

25 6. The "Class Vehicles" herein include all vehicles in the United States that contain
 26 the SDM Calibration Defect that were (1) manufactured, sold, distributed, or leased by
 27 Defendants or (2) manufactured, sold, distributed, or leased by Old GM and purchased or leased
 28 by Plaintiffs or a Class member after July 10, 2009.

7. The SDM Calibration Defect exists in all GM trucks and SUVs starting with model year 1999. This would include, for example, trucks and SUVs such as the Silverado, Tahoe, Astro, and Trailblazer. The information presently available to Plaintiffs shows that, after it was introduced in or about 1999, ~~the calibration defect persisted~~ GM continued to implement its defective cutoff strategy in software used in GM SUVs through model year 2018. Discovery will reveal when, if ever, GM discontinued use of the SDM Calibration Defect in its trucks and SUVs. This information is uniquely in the Defendants' hands, as only GM (and Delco, n/k/a Aptiv) possess the software calibration files for GM vehicles that will demonstrate the presence of the defect in the software; these files are not downloadable or otherwise accessible from the vehicles themselves, meaning Plaintiffs are unable to obtain those files on their own.

8. The proposed Class includes all persons and entities that purchased or leased a Class Vehicle in the state of California.

9. Excluded from the Class are:

a. Defendants' officers, directors and employees; Defendants' affiliates and affiliates' officers, directors, and employees; Defendants' distributors and distributors' officers, directors, and employees; and

b. Judicial officers and their immediate family members and associated court staff assigned to this case.

10. Certification of Plaintiffs' claims for class-wide treatment is appropriate because Plaintiffs can prove the elements of their claims on a class-wide basis using the same evidence as would be used in individual actions alleging the same claims.

11. Plaintiffs reserve the right to amend the Class definitions if discovery and further investigation reveal that any Class should be expanded, reduced, divided into additional subclasses under Rule 23(c)(5), or otherwise modified.

B. Numerosity: Federal Rule of Civil Procedure 23(a)(1)

12. The members of the Class are so numerous and geographically dispersed that individual joinder of all Class members is impracticable. There are millions of Class Vehicles nationwide, a significant number of which are in the state of California. The precise number and

identities of the California Class members may be ascertained from Defendants' records and motor vehicle regulatory data. Class members may be notified of the pendency of this action by recognized, Court-approved notice dissemination methods.

C. Commonality and Predominance: Federal Rule of Civil Procedure 23(a)(2) and 23(b)(3)

13. This action involves common questions of law and fact, which predominate over any questions affecting individual Class members. These include, without limitation, the following:

- a. Whether the Class Vehicles' SDM software calibration is defective, as described herein;
- b. Whether Defendants knew, or should have known, about the SDM Calibration Defect, and, if so, how long they have or should have known about it;
- c. Whether Defendants had a duty to disclose the defective nature of the Class Vehicles to Plaintiffs and Class members;
- d. Whether Defendants' concealment of the SDM Calibration Defect caused Plaintiffs and Class members to act to their detriment by purchasing or leasing the Class Vehicles;
- e. Whether Defendants' certifications concerning vehicle safety were misleading considering the risk that the SDMs will not trigger airbags and seatbelts during certain types of collisions;
- f. Whether Defendants' conduct tolls any or all applicable limitations periods by acts of fraudulent concealment, application of the discovery rule, or equitable estoppel;
- g. Whether Defendants misrepresented that the Class Vehicles were safe;
- h. Whether Defendants concealed the SDM Calibration Defect;
- i. Whether Defendants' statements, concealments, and omissions regarding the Class Vehicles were material, in that a reasonable consumer could consider them important in purchasing, leasing, selling, maintaining, or operating such vehicles;

j. Whether Defendants engaged in unfair, deceptive, unlawful, and/or fraudulent acts or practices, in trade or commerce, by failing to disclose that the Class Vehicles were designed, manufactured, sold, and leased with defective airbag components;

k. Whether the Class Vehicles were unfit for the ordinary purposes for which they were used, in violation of the implied warranty of merchantability;

l. Whether Defendants' concealment of the true defective nature of the Class Vehicles caused their market price to incorporate a premium reflecting the assumption by consumers that the Class Vehicles were equipped with fully functional passenger safety systems and, if so, the market value of that premium; and

m. Whether Plaintiffs and the other Class members are entitled to damages and other monetary relief and, if so, in what amount.

D. Typicality: Federal Rule of Civil Procedure 23(a)(3)

14. Plaintiffs' claims are typical of the claims of Class members whom they seek to represent under Fed. R. Civ. P. 23(a)(3), because Plaintiffs and each Class member purchased or leased a Class Vehicle and were comparably injured through Defendants' wrongful conduct as described above. Plaintiffs and the other Class members suffered damages as a direct proximate result of the same wrongful practices by Defendants. Plaintiffs' claims arise from the same practices and courses of conduct that give rise to the claims of the other Class members. Plaintiffs' claims are based upon the same legal theories as the claims of the other Class members.

E. Adequacy: Federal Rule of Civil Procedure 23(a)(4)

15. Plaintiffs will fairly and adequately represent and protect the interests of the Class members as required by Fed. R. Civ. P. 23(a)(4). Plaintiffs' interests do not conflict with the interests of the Class members. Plaintiffs have retained counsel competent and experienced in complex class action litigation, including automobile defect litigation and other consumer protection litigation. Plaintiffs intend to prosecute this action vigorously. Neither Plaintiffs nor their counsel have interests that conflict with the interests of the other Class members. Therefore, the interests of the Class members will be fairly and adequately protected.

1 **F. Declaratory and Injunctive Relief: Federal Rule of Civil Procedure 23(b)(2)**

2 16. Defendants have acted or refused to act on grounds generally applicable to
3 Plaintiffs and the other members of the Class, thereby making appropriate final injunctive relief
4 and declaratory relief, as described below, with respect to the Class as a whole.

5 **G. Superiority: Federal Rule of Civil Procedure 23(b)(3)**

6 17. A class action is superior to any other available means for the fair and efficient
7 adjudication of this controversy, and no unusual difficulties are likely to be encountered in its
8 management. The damages or other financial detriment suffered by Plaintiffs and the other Class
9 members are relatively small compared to the burden and expense that would be required to
10 individually litigate their claims against Defendants such that it would be impracticable for
11 members of the Class to individually seek redress for Defendants' wrongful conduct.

12 18. Even if Class members could afford individual litigation, the court system could
13 not. Individualized litigation creates a potential for inconsistent or contradictory judgments and
14 increases the delay and expense to all parties and the court system. By contrast, the class action
15 device presents far fewer management difficulties and provides the benefits of single
16 adjudication, economy of scale, and comprehensive supervision by a single court.

17 **VI. ANY APPLICABLE STATUTES OF LIMITATION ARE TOLLED**

18 19. Defendants have known of the SDM Calibration Defect since at least 2009, when
19 GM learned, through books, records, and personnel, that Old GM had launched the defective
20 calibration strategy despite clear warnings of the risk of doing so, and then continued to use that
21 defective software strategy thereafter. They obtained further knowledge of the risks of the SDM
22 Calibration Defect from lawsuits and multiple suspicious accidents (involving airbag and seatbelt
23 failures in frontal accidents) occurring in practically every year since, which provided additional
24 and confirmatory notice of the continued risks of the SDM Calibration Defect.

25 20. GM had a duty to disclose the SDM Calibration Defect to consumers and NHTSA.
26 Instead, GM knowingly, affirmatively, and actively concealed the defect from regulators and
27 consumers by continuing to distribute, sell, and/or lease the Class Vehicles to Plaintiffs and the
28

1 Class members; to advertise the safety of the Class Vehicles; and to fail to notify regulators or
 2 Plaintiffs and the Class members about the true nature of the Class Vehicles.

3 21. As of the date of this Complaint, GM still has not disclosed, and continues to
 4 conceal, that the Class Vehicles are defective, that the SDM Calibration Defect could prevent the
 5 airbags and seatbelts from activating during certain kinds of frontal collisions, and that these
 6 Class Vehicles' safety systems may fail them in life-threatening collisions. Despite its knowledge
 7 of the SDM Calibration Defect and its attendant safety risks, GM continues to market the Class
 8 Vehicles based on superior safety and reliability while omitting the disclosure safety and
 9 reliability risks associated with the SDM Calibration Defect.

10 22. Plaintiffs and members of the proposed Class could not have discovered through
 11 the exercise of reasonable diligence that GM was concealing the SDM Calibration Defect in their
 12 vehicles and misrepresenting the defective nature of the Class Vehicles.

13 23. With respect to Class Vehicles that have not experienced airbags or seatbelt
 14 failure, Plaintiffs and other Class members did not discover, could not reasonably have
 15 discovered, and had no reason to suspect that their Class Vehicles are defective, that GM
 16 calibrated the software program that controls the SDM to ~~prevent~~ prematurely cutoff airbag and
 17 seatbelt deployment ~~just 45 milliseconds~~ after a crash has begun, that—in affirmatively blocking
 18 these critical safety features ~~after 45 milliseconds—GM~~ too early—GM significantly and
 19 unnecessarily increased the risk of injury and death in frontal crashes, that the safety of their
 20 Class Vehicles is impaired by this defect such that the Class Vehicles' safety system may fail
 21 them in potentially deadly collisions, or that, as a result of the foregoing, they overpaid for their
 22 vehicles, and/or the value of their vehicles is diminished.

23 24. With respect to Class Vehicles that have experienced airbag and/or seatbelt failure
 24 prior to the filing of this Complaint, Class members did not discover and could not reasonably
 25 have discovered that such failure was due to a defect known to GM through a dangerous and
 26 defective approach to SDM software calibration.

27 25. Plaintiffs and other Class members did not discover, and did not know of, facts
 28 that would have caused a reasonable person to suspect that GM did not report this material

1 information within their knowledge to consumers, dealerships, or relevant authorities; nor would
 2 a reasonable and diligent investigation have disclosed that GM was aware of the defective nature
 3 of the SDM software calibration and the Class Vehicles in which it was incorporated.

4 26. Due to the highly technical nature of the SDM Calibration Defect, Plaintiffs and
 5 Class members were unable to independently discover it using reasonable diligence. Absent
 6 counsel and third-party consultants with relevant expertise, Plaintiffs and Class members lack the
 7 necessary expertise to analyze the software algorithm for the SDMs, or vehicle safety system
 8 performance in ~~and~~ an accident, and to understand its defective nature. GM has not issued a recall
 9 or issued other similar public statements about the SDM Calibration Defect, and Plaintiffs first
 10 learned of the defective nature of the SDM software calibration in their vehicles, and of GM's
 11 scheme to design and sell vehicles with defective SDM software calibrations, only in connection
 12 with retaining counsel and filing this lawsuit in 2021 (for Plaintiff Vargas and Milstead). Plaintiff
 13 Ray learned of the SDM Calibration Defect in connection with retention of counsel in late 2020,
 14 and was also aware of the pendency of this putative class action before filing his claims ~~in this~~
 15 ~~pleading~~.

16 27. For the foregoing reasons, GM is estopped from relying on any statutes of
 17 limitation or repose as a defense in this action. All applicable statutes of limitation and repose
 18 have been tolled by operation of the discovery rule and by GM's fraudulent concealment with
 19 respect to all claims against GM.

20 **VII. CAUSES OF ACTION**

21 **COUNT I:** 22 **FRAUD BY CONCEALMENT** 23 **(Common Law)**

24 28. Plaintiffs re-allege and incorporate by reference all paragraphs as though fully set
 25 forth herein.

26 29. Plaintiffs bring this claim against all Defendants on behalf of themselves and the
 27 California State Class under the common law of fraudulent concealment.
 28

30. Defendants are liable for both fraudulent concealment and non-disclosure. *See, e.g.,* Restatement (Second) of Torts §§ 550-51 (1977).

31. Defendants intentionally and knowingly concealed and suppressed material facts from regulators and consumers regarding the SDM Calibration Defect that causes the airbags and seatbelts to fail in prolonged onset, complex, or otherwise multi-impact accidents, causing a serious risk of injury or death.

32. A reasonable consumer would not have expected that the Class Vehicles contained a software program that was calibrated to prevent seatbelt tightening and airbag deployment during certain types of frontal crashes that are otherwise severe enough to require them.

Defendants knew that reasonable consumers expect that their vehicle has working airbags and seatbelt pretensioners and would rely on those facts in deciding whether to purchase, lease, or retain a new or used motor vehicle. Whether a manufacturer's products are safe and reliable, and whether that manufacturer stands behind its products, are material concerns to a consumer.

33. Defendants ensured that Plaintiffs and the Class did not discover this information by actively concealing and misrepresenting the true nature of the Class Vehicles' safety systems. Defendants intended for Plaintiffs and the Class to rely on their omissions—which they did by purchasing and leasing the Class Vehicles at the prices they paid.

34. Defendants had a duty to disclose the SDM Calibration Defect because:

a. GM had exclusive and/or far superior knowledge and access to the facts about this hidden and complex safety defect. Defendants also knew that these technical facts were not known to or reasonably discoverable by Plaintiffs and the Class; GM knew the SDM Calibration Defect (and its safety risks) was a material fact that would affect Plaintiffs' or Class members' decisions to buy or lease Class Vehicles; GM is subject to statutory duties to disclose known safety defects to consumers and to NHTSA; GM's actions to avoid investigations and a recall due to the defect deprived consumers of an opportunity in which they could have learned about it; and GM made incomplete representations about the safety and reliability of the Class Vehicles and their passenger safety systems, while purposefully withholding material facts about a known safety defect. In uniform advertising and materials provided with each Class Vehicle,

Defendants intentionally concealed, suppressed, and failed to disclose to Plaintiffs and the Class that the Class Vehicles contained the dangerous SDM Calibration Defect. Because they volunteered to provide information about the Class Vehicles that they offered for sale to Plaintiffs and the Class, Defendants had the duty to disclose the whole truth. They did not.

35. To this day, Defendants have not made full and adequate disclosure and continue to conceal material information regarding the SDM Calibration Defect. The omitted and concealed facts were material because a reasonable person would find them important in purchasing, leasing, or retaining a new or used motor vehicle, and because they directly impact the value of the Class Vehicles purchased or leased by Plaintiffs and the Class.

36. Defendants actively concealed or suppressed these material facts, in whole or in part, to maintain a market for their vehicles, to protect profits, and to avoid costly recalls that would hurt the GM brand's image. They did so at the expense of Plaintiffs and the Class. Had they been aware of the SDM Calibration Defect in the Class Vehicles, and Defendants' callous disregard for safety, Plaintiffs and the Class either would not have paid as much as they did for their Class Vehicles, or they would not have purchased or leased them.

37. Accordingly, Defendants are liable to Plaintiffs and the Class for their damages in an amount to be proven at trial, including, but not limited to, their lost overpayment for the Class Vehicles at the time of purchase or lease.

38. Defendants' acts were done maliciously, oppressively, deliberately, with intent to defraud; in reckless disregard of Plaintiffs' and the Class' rights and well-being; and to enrich themselves. Their misconduct warrants an assessment of punitive damages in an amount sufficient to deter such conduct in the future, which amount shall be determined according to proof at trial.

**COUNT II:
UNJUST ENRICHMENT
(Common Law)**

39. Plaintiffs re-allege and incorporate by reference all paragraphs as though fully set forth herein.

40. Plaintiffs Richard Vargas and Arthur Ray assert this Unjust Enrichment count on behalf of themselves and the California State Class.

41. By reason of their conduct, Defendants caused damages to Plaintiffs and Class members. Plaintiffs and Class members conferred a benefit on the Defendants by overpaying for Class Vehicles at prices that were artificially inflated by Defendants' concealment of the SDM Calibration Defect and misrepresentations regarding the Class Vehicles' safety.

42. As a result of Defendants' fraud and deception, Plaintiffs and Class members were not aware of the true facts concerning the Class Vehicles and did not benefit from the Defendants' misconduct.

43. Defendants knowingly benefitted from their unjust conduct. They sold and leased Class Vehicles equipped with the SDM Calibration Defect for more than what the vehicles were worth, at the expense of Plaintiffs and Class members.

44. Defendants readily accepted and retained these benefits from Plaintiffs and Class members.

45. It is inequitable and unconscionable for Defendants to retain these benefits because they misrepresented that the Class Vehicles were safe, and intentionally concealed, suppressed, and failed to disclose the SDM Calibration Defect to consumers. Plaintiffs and Class members would not have purchased or leased the Class Vehicles or would have paid less for them, had Defendants not concealed the SDM Calibration Defect.

46. Plaintiffs and Class members do not have an adequate remedy at law.

47. Equity cannot in good conscience permit the Defendants to retain the benefits that they derived from Plaintiffs and Class members through unjust and unlawful acts, and therefore restitution or disgorgement of the amount of the Defendants' unjust enrichment is necessary.

COUNT III:
Violation of California Consumers Legal Remedies Act
Cal. Civ. Code § 1750, et seq.

48. Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

1 49. Plaintiffs bring this claim on behalf of themselves and the California State Class
2 against the Defendants.

3 50. Plaintiffs and California State Class members are “consumers” within the meaning
4 of Cal. Civ. Code § 1761(d).

5 51. Defendants, the California Plaintiffs, and California State Class members are
6 “persons” within the meaning of Cal. Civ. Code § 1761(c).

7 52. The Class Vehicles are “goods” within the meaning of Cal. Civ. Code § 1761(a).

8 53. The California Legal Remedies Act (“CLRA”) prohibits “unfair methods of
9 competition and unfair or deceptive acts or practices undertaken by any person in a transaction
10 intended to result or that results in the sale or lease of goods or services to any consumer[.]” Cal.
11 Civ. Code § 1770.

12 54. Defendants engaged in unfair or deceptive acts or practices when, in the course of
13 their business they, among other acts and practices, intentionally and knowingly made materially
14 false representations regarding the reliability, safety, and performance of the Class Vehicles
15 and/or the defective SDM software calibration, as detailed above.

16 55. Specifically, by misrepresenting the Class Vehicles as safe and/or free from
17 defects, and by failing to disclose and actively concealing the dangers and risk posed by the Class
18 Vehicles, Defendants engaged in one or more of the following unfair or deceptive business
19 practices as defined in Cal. Civ. Code § 1770(a):

- 20 a. Representing that the Class Vehicles have characteristics, uses, benefits, and qualities
21 which they do not have.
- 22 b. Representing that the Class Vehicles are of a particular standard, quality, and grade
23 when they are not.
- 24 c. Advertising the Class Vehicles and/or with the intent not to sell or lease them as
25 advertised.
- 26 d. Representing that the subject of a transaction has been supplied in accordance with a
27 previous representation when it has not.

28 Cal. Civ. Code §§ 1770(a)(5), (7), (9), and (16).

1 56. Additionally, in the various channels of information through which Defendants
 2 sold and marketed Class Vehicles, Defendants failed to disclose material information concerning
 3 the Class Vehicles, which they had a duty to disclose. Defendants had a duty to disclose the
 4 defect because, as detailed above: (a) Defendants knew about the defect in the SDM software
 5 calibration in the Class Vehicles; (b) Defendants had exclusive knowledge of material facts not
 6 known to the general public or the other California State Class members; (c) Defendants actively
 7 concealed material facts concerning the software calibration from the general public and Plaintiffs
 8 and California State Class members; and (d) Defendants made partial representations about the
 9 Class Vehicles that were misleading because they did not disclose the full truth.

10 57. Defendants' unfair or deceptive acts or practices, including their
 11 misrepresentations, concealments, omissions, and/or suppressions of material facts, had a
 12 tendency or capacity to mislead and create a false impression in consumers, and were likely to
 13 and did in fact deceive reasonable consumers, including Plaintiffs and California State Class
 14 members, about the true safety and reliability of Class Vehicles, the quality of the Class Vehicles,
 15 and the true value of the Class Vehicles.

16 58. Plaintiffs and the other California State Class members have suffered injury in fact
 17 and actual damages resulting from Defendants' material omissions.

18 59. Defendants' violations present a continuing risk to Plaintiffs and California State
 19 Class members, as well as to the general public, and therefore affect the public interest.

20 60. Defendants are on notice of the issues raised in this count and this Complaint by
 21 way of, among other things, the individual personal injury litigation and hundreds of public
 22 consumer complaints detailed above, as well as their own intrinsic knowledge of defect they have
 23 included in the Class Vehicles by design. Plaintiffs also sent a notice letter to Defendants in
 24 accordance with Cal. Civ. Code § 1782(a) of the CLRA, notifying Defendants of their alleged
 25 violations of Cal. Civ. Code § 1770(a) and demanding that Defendants correct or agree to correct
 26 the actions described therein within thirty (30) days of the notice letter. Defendants did not
 27 correct or agree to correct their actions within thirty days, and Plaintiffs therefore seek
 28

1 compensatory and monetary damages to which Plaintiffs and California Class Members are
2 entitled under the CLRA.

3 61. Attached hereto as Exhibit C is the venue affidavit required by CLRA, Cal. Civ.
4 Code § 1780(d).

5 **COUNT IV:**
6 **Violations of the California Unfair Competition Law**
7 **Cal. Bus. & Prof. Code § 17200, *et seq.***

8 62. Plaintiffs re-allege and incorporate by reference all preceding allegations as though
9 fully set forth herein.

10 63. Plaintiffs bring this claim on behalf of themselves and the California State Class
11 against the Defendants.

12 64. The California Unfair Competition Law (“UCL”), Cal. Bus. and Prof. Code
13 § 17200, prohibits any “unlawful, unfair, or fraudulent business act or practices.”

14 65. Defendants’ knowing and intentional conduct described in this Complaint
15 constitutes unlawful, fraudulent, and unfair business acts and practices in violation of the UCL.
16 Specifically, Defendants’ conduct is unlawful, fraudulent, and unfair in at least the following
17 ways:

18 a. by knowingly and intentionally concealing from Plaintiffs and California
19 State Class members that the Class Vehicles suffer from the SDM Calibration Defect while
20 obtaining money from the California State Class members;

21 b. by marketing Class Vehicles as possessing a functional, safe, and defect-
22 free passenger safety system;

23 c. by purposefully designing and manufacturing the Class Vehicles to contain
24 a defective SDM software calibration that causes airbags and seatbelts to fail in certain accidents
25 contrary to what was disclosed to regulators and represented to consumers who purchased or
26 leased Class Vehicles, and failing to fix the SDM Calibration Defect free of charge; and
27
28

d. by violating the other California laws alleged herein, including the False Advertising Law, Consumers Legal Remedies Act, California Commercial Code, and Song-Beverly Consumer Warranty Act.

66. Defendants' misrepresentations, omissions, and concealment were material to the California Plaintiffs and California State Class members, and Defendants misrepresented, concealed, or failed to disclose the truth with the intention that consumers would rely on the misrepresentations, concealment, and omissions.

67. Defendants' material misrepresentations and omissions alleged herein caused Plaintiffs and the California State Class members to make their purchases or leases of their Class Vehicles. Absent those misrepresentations and omissions, Plaintiffs and California State Class members would not have purchased or leased these vehicles or would not have purchased or leased these Class Vehicles at the prices they paid.

68. Accordingly, Plaintiffs and California State Class members have suffered ascertainable loss and actual damages as a direct and proximate result of Defendants' misrepresentations and their concealment of and failure to disclose material information.

69. Defendants' violations present a continuing risk to Plaintiffs and California State Class members, as well as to the general public. Defendants' unlawful acts and practices complained of herein affect the public interest.

70. Plaintiffs request that this Court enter an order enjoining Defendants from continuing their unfair, unlawful, and/or deceptive practices and restoring to members of the California State Class any money Defendants acquired by unfair competition, including restitution and/or restitutionary disgorgement, as provided in Cal. Bus. & Prof. Code § 17203 and Cal. Bus. & Prof. Code § 3345, and for such other relief set forth below.

**COUNT V:
Violations of the California False Advertising Law
Cal. Bus. & Prof. Code § 17500, *et seq.***

71. Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

1 72. Plaintiffs bring this claim on behalf of themselves and the California State Class
2 against the Defendants.

3 73. The California False Advertising Law (“FAL”), Cal. Bus. & Prof. Code § 17500,
4 prohibits false advertising.

5 74. Defendants, Plaintiffs, and California State Class members are “persons” within
6 the meaning of Cal. Bus. & Prof. Code § 17506.

7 75. Defendants violated the FAL by causing to be made or disseminated through
8 California and the United States, through advertising, marketing and other publications,
9 statements regarding the safety of the Class Vehicles that were untrue or misleading, and which
10 were known, or which by the exercise of reasonable care should have been known to Defendants,
11 to be untrue and misleading to consumers, including California State Class members. Numerous
12 examples of these statements and advertisements appear in the preceding paragraphs throughout
13 this Complaint and in Exhibit B.

14 76. The misrepresentations and omissions regarding the reliability and safety of Class
15 Vehicles as set forth in this Complaint were material and had a tendency or capacity to mislead
16 and create a false impression in consumers, and were likely to and did in fact deceive reasonable
17 consumers, including Plaintiffs and California State Class members, about the true safety and
18 reliability of Class Vehicles, the quality of the Defendants’ brands, and the true value of the Class
19 Vehicles.

20 77. In purchasing or leasing their Class Vehicles, the California State Class members
21 relied on the misrepresentations and/or omissions of Defendants with respect to the safety and
22 reliability of the Class Vehicles. Defendants’ representations turned out not to be true because the
23 Class Vehicles are distributed with a dangerous safety defect, rendering the vehicles’ airbags and
24 seatbelts inoperative in certain types of accidents.

25 78. Plaintiffs and the other California State Class members have suffered an injury in
26 fact, including the loss of money or property, as a result of Defendants’ unfair, unlawful, and/or
27 deceptive practices. Had they known the truth, Plaintiffs and California State Class members
28

1 would not have purchased or leased the Class Vehicles or would have paid significantly less for
2 them.

3 79. Plaintiffs and California State Class members had no way of discerning that
4 Defendants' representations were false and misleading, or otherwise learning the facts that
5 Defendants had concealed or failed to disclose. Plaintiffs and California State Class members did
6 not, and could not, unravel Defendants' deception on their own.

7 80. Defendants had an ongoing duty to Plaintiffs and California State Class members
8 to refrain from unfair or deceptive practices under the California False Advertising Law in the
9 course of their business. Specifically, the Defendants owed Plaintiffs and California State Class
10 members a duty to disclose all the material facts concerning the SDM Calibration Defect in the
11 Class Vehicles because they possessed exclusive knowledge, they intentionally concealed the
12 defect from Plaintiffs and California State Class members, and/or they made misrepresentations
13 that were misleading because they were contradicted by withheld facts.

14 81. All of the wrongful conduct alleged herein occurred, and continues to occur, in the
15 conduct of Defendants' business. Defendants' wrongful conduct is part of a pattern or generalized
16 course of conduct that is still perpetuated and repeated, both in the State of California and
17 nationwide.

18 82. Defendants' violations present a continuing risk to Plaintiffs and California State
19 Class members, as well as to the general public. Defendants' unlawful acts and practices
20 complained of herein affect the public interest.

21 83. Plaintiffs request that this Court enter an order enjoining Defendants from
22 continuing their unfair, unlawful, and/or deceptive practices and restoring to the California State
23 Class any money Defendants acquired by unfair competition, including restitution and/or
24 restitutionary disgorgement, and for such other relief set forth below.

COUNT VI:
Breach of Express Warranty
Cal. Com. Code §§ 2313 and 10210

57. ~~Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.~~

58. ~~Plaintiff Richard Vargas brings this claim on behalf of himself and the California State Class against the Defendants.~~

59. ~~Defendants are and were at all relevant times “merchant[s]” with respect to motor vehicles under Cal. Com. Code §§ 2104(1) and 10103(c), and “sellers” of motor vehicles under § 2103(1)(d).~~

60. ~~With respect to leases, Defendants are and were at all relevant times “lessors” of motor vehicles under Cal. Com. Code § 10103(a)(16).~~

61. ~~All California State Class members who purchased Class Vehicles in California are “buyers” within the meaning of Cal. Com. Code § 2103(1)(a).~~

62. ~~All California State Class members who leased Class Vehicles in the California are “lessees” within the meaning of Cal. Com. Code § 10103(a)(14).~~

63. ~~The Class Vehicles are and were at all relevant times “goods” within the meaning of Cal. Com. Code §§ 2105(1) and 10103(a)(8).~~

64. ~~In connection with the purchase or lease of Class Vehicles, Defendants provided Plaintiffs and California State Class members with written express warranties covering the repair or replacement of components that are defective in materials or workmanship.~~

65. ~~Defendants’ warranties formed the basis of the bargain that was reached when Plaintiffs and California State Class members unknowingly purchased or leased Class Vehicles that came equipped with the SDM Calibration Defect.~~

66. ~~However, Defendants knew or should have known that the warranties were false and/or misleading. Specifically, Defendants were aware of the SDM Calibration Defect in the Class Vehicles, which made the vehicles inherently defective and dangerous at the time that they were sold and leased to Plaintiffs and California State Class members.~~

~~67.—Plaintiff and California State Class members reasonably relied on Defendants’ express warranties when purchasing or leasing their Class Vehicles.~~

~~68.—Defendants knowingly breached their express warranties to repair defects in materials and workmanship by failing to repair the SDM Calibration Defect in the Class Vehicles. Defendants also breached their express warranties by providing a product containing defects that were never disclosed to Plaintiff and California State Class members.~~

~~69.—On January 27, 2023, Plaintiff Vargas presented his Class Vehicle and requested a repair for the SDM Calibration Defect under the vehicle’s warranty at Anderson Chevrolet, an authorized GM dealership in Lake Elsinore, California. In response, dealership personnel informed Mr. Vargas that there were no open recalls for the SDM software in his vehicle, and thus they would not provide a repair for the SDM Calibration Defect. Based on this refusal, Mr. Vargas left the dealership without obtaining a repair for the SDM Calibration Defect under his warranty.~~

~~70.—Defendants were on reasonable notice of these issues and an opportunity to cure the breaches due to Mr. Vargas’ request for a repair at the dealership, as well as their extensive knowledge of the SDM Calibration Defect, as detailed herein. Defendants have not cured the breaches of their warranties despite years of knowledge of those breaches.~~

~~71.—As a direct and proximate result of Defendants’ breach of express warranties, Plaintiff and California State Class members have been damaged in an amount to be proven at trial.~~

~~COUNT VII:~~COUNT VI:
Breach of Implied Warranty of Merchantability
Cal. Com. Code §§ 2314 and 10212

84. ~~72.~~ Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

85. ~~73.~~ Plaintiffs bring this claim on behalf of themselves and the California State Class against the Defendants.

86. ~~74.~~ Defendants are and were at all relevant times “merchant[s]” with respect to motor vehicles under Cal. Com. Code §§ 2104(1) and 10103(c), and “sellers” of motor vehicles under § 2103(1)(d).

87. ~~75.~~ With respect to leases, Defendants are and were at all relevant times “lessors” of motor vehicles under Cal. Com. Code § 10103(a)(16).

88. ~~76.~~ All California State Class members who purchased Class Vehicles in California are “buyers” within the meaning of Cal. Com. Code § 2103(1)(a).

89. ~~77.~~ All California State Class members who leased Class Vehicles in the California are “lessees” within the meaning of Cal. Com. Code § 10103(a)(14).

90. ~~78.~~ The Class Vehicles are and were at all relevant times “goods” within the meaning of Cal. Com. Code §§ 2105(1) and 10103(a)(8).

91. ~~79.~~ A warranty that the Class Vehicles were in merchantable condition and fit for the ordinary purpose for which vehicles are used is implied by law pursuant to Cal. Com. Code §§ 2314 and 10212.

92. ~~80.~~ The Class Vehicles did not comply with the implied warranty of merchantability because, at the time of sale and at all times thereafter, they were defective and not in merchantable condition, would not pass without objection in the trade, and were not fit for the ordinary purpose for which vehicles were used. Specifically, the Class Vehicles suffer from the SDM Calibration Defect, which may cause the airbags and seatbelt to fail to deploy during an accident, rendering the Class Vehicles inherently defective and dangerous.

93. ~~81.~~ Defendants were on reasonable notice of these issues and an opportunity to cure the breaches due to their extensive knowledge of the SDM Calibration Defect, as detailed herein. Defendants have not cured the breaches of their warranties despite years of knowledge of those breaches.

94. ~~82.~~ As a direct and proximate result of Defendants’ breach of the implied warranty of merchantability, Plaintiffs and California State Class members have been damaged in an amount to be proven at trial.

COUNT ~~VIII~~VII:
Violation of Song-Beverly Consumer Warranty Act,
Breach of Implied Warranty
Cal Civ. Code § 1790, *et seq.*

95. ~~83.~~ Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.

96. ~~84.~~ Plaintiffs bring this claim on behalf of themselves and the California State Class against the Defendants.

97. ~~85.~~ All California State Class members who purchased Class Vehicles in California are “buyers” within the meaning of Cal. Civ. Code § 1791(b).

98. ~~86.~~ All California State Class members who leased Class Vehicles in California are “lessors” within the meaning of Cal. Civ. Code § 1791(h).

99. ~~87.~~ The Class Vehicles are “consumer goods” within the meaning of Cal. Civ. Code § 1791(a).

100. ~~88.~~ Defendants are the “manufacturer[s]” of the Class Vehicles within the meaning of Cal. Civ. Code § 1791(j).

101. ~~89.~~ Defendants impliedly warranted to Plaintiffs and the other members of the California State Class that the Class Vehicles were “merchantable” within the meaning of Cal. Civ. Code §§ 1791.1(a) & 1792; however, the Class Vehicles do not have the quality that a buyer would reasonably expect.

102. ~~90.~~ The Class Vehicles would not pass without objection in the automotive trade due to the SDM Calibration Defect. Because the Class Vehicles contain defective SDMs, the Class Vehicles are not in merchantable condition and thus not fit for ordinary purposes.

103. ~~91.~~ The Class Vehicles are not adequately labeled because the labeling fails to disclose the SDM Calibration Defect. The Class Vehicles do not conform to the promises and affirmations made by the Defendants regarding safety.

104. ~~92.~~ The Defendants’ breach of the implied warranty of merchantability caused damage to Plaintiff Vargas and California State Class members who purchased or leased the defective Class Vehicles. The amount of damages due will be proven at trial.

105. ~~93.~~ Pursuant to Cal. Civ. Code §§ 1791.1(d) and 1794, Plaintiffs and California State Class members seek an order enjoining Defendants' unfair and/or deceptive acts or practices, damages, punitive damages, and any other just and proper relief available under the Song-Beverly Consumer Warranty Act.

**COUNT IX:
~~Violation of the Song-Beverly Consumer Protection Act,
 Breach of Express Warranty
 Cal Civ. Code § 1790, et seq.~~**

~~94.—Plaintiffs re-allege and incorporate by reference all preceding allegations as though fully set forth herein.~~

~~95.—Plaintiff Vargas brings this claim on behalf of himself and the California State Class against the Defendants.~~

~~96.—All California State Class members who purchased Class Vehicles in California are “buyers” within the meaning of Cal. Civ. Code § 1791(b).~~

~~97.—All California State Class members who leased Class Vehicles in California are “lessors” within the meaning of Cal. Civ. Code § 1791(h).~~

~~98.—The Class Vehicles are “consumer goods” within the meaning of Cal. Civ. Code § 1791(a).~~

~~99.—Defendants are “manufacturer[s]” of the Class Vehicles within the meaning of California Civil Code § 1791(j).~~

~~100.—Defendants are and were at all relevant times “sellers” of motor vehicles under Cal. Civ. Code § 1791(l).~~

~~101.—With respect to leases, Defendants are and were at all relevant times “lessors” of motor vehicles under Cal. Civ. Code § 1791(i).~~

~~102.—Defendants made express warranties to members of the California State Class within the meaning of California Civil Code §§ 1791.2 and 1793.2.~~

~~103.—In connection with the purchase or lease of Class Vehicles, Defendants provided Plaintiff and California State Class members with written express warranties covering the repair or replacement of components that are defective in materials or workmanship.~~

~~104.—Defendants’ warranties formed the basis of the bargain that was reached when Plaintiff and California State Class members unknowingly purchased or leased their Class Vehicles equipped with the SDM Calibration Defect.~~

~~105.—However, Defendants knew or should have known that their warranties were false and misleading. Specifically, Defendants were aware of the SDM Calibration Defect in the Class Vehicles which made the vehicles inherently defective and dangerous at the time that they were sold and leased to Plaintiff and California State Class members.~~

~~106.—Plaintiff and California State Class members reasonably relied on Defendants’ express warranties when purchasing or leasing the California Class Vehicles.~~

~~107.—Defendants knowingly breached their express warranties to repair defects in materials and workmanship by failing to repair the SDM Calibration Defect in the Class Vehicles. Defendants also breached their express warranties by providing a product containing defects that were never disclosed to Plaintiff and California State Class members.~~

~~108.—Defendants were on reasonable notice of these issues and an opportunity to cure the breaches due to their extensive knowledge of the SDM Defect, as detailed herein. Defendants have not cured the breaches of their warranties despite years of knowledge of those breaches, as detailed herein.~~

~~109.—As a result of Defendants’ breach of their express warranties, members of the California State Class received goods whose defect substantially impairs their value to Plaintiffs and the other members of the California State Class. Plaintiffs and members of the California State Class have been damaged as a result of, inter alia, the diminished value of Defendants’ products.~~

~~110.—Pursuant to California Civil Code §§ 1793.2 & 1794, Plaintiffs and members of the California State Class are entitled to damages and other legal and equitable relief including, at their election, the purchase price of their Class Vehicles, or the overpayment or diminution in value of their Class Vehicles.~~

~~111.—Pursuant to California Civil Code § 1794, the Class is entitled to costs and attorneys’ fees.~~

1 **VIII. PRAYER FOR RELIEF**

2 Plaintiffs, on behalf of themselves and all others similarly situated, request for the Court
3 to enter judgment against the Defendants, as follows:

4 a. An order certifying the proposed Class, designating Plaintiffs as the named
5 representatives of the Class, designating the undersigned as Class Counsel, and making such
6 further orders for the protection of Class members as the Court deems appropriate, under Fed. R.
7 Civ. P. 23;

8 b. An order enjoining the Defendants to desist from further deceptive
9 distribution, sales, and lease practices with respect to the Class Vehicles and such other injunctive
10 relief that the Court deems just and proper;

11 c. An award to Plaintiffs and Class Members of compensatory, exemplary,
12 and punitive remedies and damages and statutory penalties, including interest, in an amount to be
13 proven at trial;

14 d. A declaration that Defendants are financially responsible for all Class
15 notice and the administration of Class relief;

16 e. Costs, restitution, and compensatory damages for economic loss and out-
17 of-pocket costs, multiple damages under applicable states' laws; punitive and exemplary damages
18 under applicable law; and disgorgement, in an amount to be determined at trial;

19 f. Any applicable statutory and civil penalties;

20 g. An award of costs and attorneys' fees, as allowed by law;

21 h. An order requiring Defendants to pay both pre- and post-judgment interest
22 on any amounts awarded.

23 i. Leave to amend this Complaint to conform to the evidence produced at
24 trial; and

25 j. Such other or further relief as the Court may deem appropriate, just, and
26 equitable under the circumstances.

1 **IX. DEMAND FOR JURY TRIAL**

2 Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by jury of any
3 and all issues in this action triable by a jury.

1 Dated: ~~January~~July 27, 2023

Respectfully Submitted,

2 By: /s/ David S. Stellings

3 David S. Stellings (*pro hac vice*)
4 Katherine I. McBride (*pro hac vice*)
5 Jessica A. Moldovan (*pro hac vice*)
6 **LIEFF CABRASER HEIMANN**
7 **& BERNSTEIN, LLP**
8 250 Hudson Street, 8th Floor
9 New York, NY 10013
10 Telephone: 212.355.9500
11 Facsimile: 212.355.9592
12 dstellings@lchb.com
13 kmcbride@lchb.com
14 jmoldovan@lchb.com

15 Richard Heimann (CA Bar # 063607)
16 Nimish R. Desai (CA Bar # 244953)
17 **LIEFF CABRASER HEIMANN**
18 **& BERNSTEIN, LLP**
19 275 Battery St., 29th Fl.
20 San Francisco, CA 94111-3339
21 Telephone: 415-956-1000
22 Facsimile: 415-956-1008
23 rheimann@lchb.com
24 ndesai@lchb.com

25 Roland Tellis (CA Bar #186269)
26 David Fernandes (CA Bar #280944)
27 Adam Tamburelli (CA Bar #301902)
28 **BARON & BUDD, P.C.**
15910 Ventura Boulevard, Suite 1600
Encino, California 91436
Telephone: (818) 839-2333
Facsimile: (818)-986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com
atamburelli@baronbudd.com

Christopher A. Seeger (*pro hac vice*)
Christopher L. Ayers (*pro hac vice*)
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 639-9393
cseeger@seegerweiss.com
cayers@seegerweiss.com

Shauna Itri (*pro hac vice*)
SEEGER WEISS LLP
1515 Market Street, Suite 1380
Philadelphia, PA 19102
Telephone: (215) 564-2300
Facsimile: (215) 851-8029
sitri@seegerweiss.com

W. Daniel “Dee” Miles, III (*pro hac vice*)
H. Clay Barnett, III (*pro hac vice*)
J. Mitch Williams (*pro hac vice*)
Rebecca D. Gilliland (*pro hac vice*)
Dylan T. Martin (*pro hac vice*)
**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.**
272 Commerce Street
Montgomery, AL 36104
Telephone: (334) 269-2343
Dee.Miles@beasleyallen.com
Clay.Barnett@beasleyallen.com
Mitch.Williams@beasleyallen.com
Rebecca.Gilliland@beasleyallen.com
Dylan.Martin@beasleyallen.com

David M. Birka-White (CA Bar # 85721)
BIRKA-WHITE LAW OFFICES
178 E. Prospect Avenue
Danville, CA 94526
Telephone: (925) 362-9999
dbw@birka-white.com

James E. Cecchi (*pro hac vice*)
Caroline F. Bartlett (*pro hac vice*)
**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
Facsimile: (973) 994-1744
jcecchi@carellabyrne.com
cbartlett@carellabyrne.com

Joseph H. Meltzer (*pro hac vice*)
Melissa L. ~~Troutner~~ Yeates (*pro hac vice*)
**KESSLER TOPAZ
MELTZER & CHECK, LLP**

280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
jmeltzer@ktmc.com
~~mttroutner@ktmc.com~~

myeates@ktmc.com

Charles E. Schaffer (*pro hac vice*)
David C. Magagna Jr. (*pro hac vice*)
LEVIN, SEDRAN & BERMAN, LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
cschaffer@lfsblaw.com
dmagagna@lfsblaw.com

E. Powell Miller (*pro hac vice forthcoming*)
THE MILLER LAW FIRM, P.C.
950 West University Drive, Suite 300
Rochester, MI 48307
Telephone: (248) 841-2200
Facsimile: (248) 652-2852
epm@millerlawpc.com

Jason P. Sultzer, Esq. (*pro hac vice*)
THE SULTZER LAW GROUP P.C.
270 Madison Avenue, Suite 1800
New York, NY 10016
Tel: (845) 483-7100
Fax: (888) 749-7747
sultzerj@thesultzerlawgroup.com