

COURT-ORDERED LEGAL NOTICE

**If you bought a new GM vehicle in Pennsylvania,
you could get benefits from a class
action settlement.**

A court authorized this notice. It is not a solicitation from a lawyer.

- A proposed settlement has been reached in a class action settlement involving the marketing programs of the Chevrolet, GMC Truck, Cadillac, Oldsmobile, Buick and Pontiac Divisions of General Motors Corporation ("GM"), as well as prices paid for new vehicles.
- Generally, the settlement includes anyone who bought a new Chevrolet, GMC Truck, Cadillac, Oldsmobile, Buick and Pontiac ("GM vehicle") in Pennsylvania between September 1, 1988 and March 31, 1999 (see Questions 5 and 6). The settlement provides rebate certificates worth up to \$200 towards the purchase or lease of new GM vehicles.
- Your legal rights are affected whether you act or don't act. Please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	The only way to get a rebate certificate.
OBJECT	Write to the Court about why you do not like the settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement.
DO NOTHING	Get no rebate certificate. Give up rights.

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the settlement. Rebate certificates will be mailed if the Court approves the settlement and after appeals are resolved. Please be patient.

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BASIC INFORMATION

1. Why did I get this notice package?

You received this notice package because records show that you may have purchased a new GM vehicle in Pennsylvania between September 1, 1988 and March 31, 1999. Because of this, you have a right to know about the proposed settlement of this class action lawsuit, and about your options, before the Court decides whether to approve the settlement. This notice explains the lawsuit, the settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

2. What is this lawsuit about?

This case is about GM adding 1% of the Manufacturer's Suggested Retail Price ("MSRP") to the invoice of certain new vehicles it sold to its dealers, as part of its "Marketing Initiative" programs. The lawsuit claims that GM required dealers to use the 1% for advertising, and that this violated the Pennsylvania Board of Vehicles Act, which says that manufacturers cannot require new vehicle dealers to financially participate in advertising campaigns. The lawsuit also claims that dealers passed the 1% on to customers when they purchased vehicles.

GM denies any wrongdoing, and states that the 1% was a legal, wholesale price increase to its dealers. GM also states that the dealers did not necessarily pass on the 1% to customers. The Court has not decided whether the Class or GM is right. The settlement does not mean that GM did anything wrong or violated any laws.

The class action is known as *Soders v. General Motors Corporation*, No. CI-00-04255. Judge Louis J. Farina of the Court of Common Pleas of Lancaster County, Pennsylvania is overseeing this class action. The person who sued is called the "Plaintiff," and the company she sued, General Motors Corporation, is called "GM" or the "Defendant."

3. What is a class action?

In a class action, one or more people called "Class Representatives" (in this case, Donna Soders) sue on behalf of people who have similar claims. All of these people are a "Class" or "Class Members." In a class action lawsuit, one court resolves the issues for everyone in the Class—except for those who excluded themselves (see Question 13).

4. Why is there a settlement?

The Court did not decide in favor of the Class or GM. Instead, both sides agreed to a settlement. The settlement provides benefits to Class Members, and avoids the costs, risks and delays of a trial. The Class Representative, her lawyers and GM believe that the settlement is fair, reasonable, adequate, and in the best interests of all Class Members.

WHO IS IN THE SETTLEMENT

To see if you can receive a rebate, you have to determine if you are a Class Member.

5. Am I part of the settlement?

The Court has decided that the Class includes everyone who purchased a new vehicle at retail in Pennsylvania from a franchised GM dealer that was made or distributed by the Chevrolet, GMC Truck, Cadillac, Oldsmobile,

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Buick or Pontiac divisions of GM. The GM dealer must have purchased the new vehicle from GM or any of its divisions between the following dates:

VEHICLE	DATE OF PURCHASE
Chevrolet or GMC Truck	September 1, 1988 and March 31, 1999
Cadillac or Oldsmobile	July 1, 1989 and March 31, 1999
Pontiac	July 1, 1990 and March 31, 1999
Buick	August 1, 1990 and March 31, 1999

6. Are there exceptions to being included?

You are not a Class Member if you:

- leased your new vehicle
- purchased your vehicle under the GM Employee Purchase Plans, as a GM-qualified fleet purchaser, or as a government entity
- are an attorney in this case
- previously asked to be excluded from the Class

7. I am still not sure if I am included.

If you are still not sure whether you are included, you can ask for free help. You can call 1-888-866-1738 or visit www.onepercentcase.com.

THE SETTLEMENT BENEFITS—WHAT YOU GET

8. What does the settlement provide?

GM will provide all eligible Class Members with rebate certificates worth up to \$200 towards the purchase or lease of a new Buick, Cadillac, Chevrolet, GMC Truck or Pontiac vehicle. GM will also separately pay the costs associated with administering the settlement, lawyers' fees and costs, and an amount to the Class Representative. More details are in a document called the [Settlement Agreement](#), which is available at www.onepercentcase.com.

9. How many rebate certificates will I receive?

You will receive one rebate certificate worth up to \$200 for each new Buick, Cadillac, Chevrolet, GMC Truck, Oldsmobile or Pontiac vehicle that you purchased during the periods listed in Question 5 above. Only one rebate certificate will be issued for each vehicle.

10. How long will the rebate certificates be valid?

The certificates will be valid until three years after the settlement receives final court approval.

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11. Can I give my rebate certificates to someone else?

If you do not plan to buy or lease a new vehicle within the next three years, you may transfer your rebate certificate(s) to your immediate household members (anyone living at the same address), your parents or your children at any time, as long as the certificate(s) have not expired.

During the last two years that the rebate certificates are valid, you may transfer your rebate certificate(s) directly to anyone. The rebate certificates will contain all the instructions you need and, once transferred, will be worth 75% of the value of the original certificate.

Each rebate certificate can be transferred only once, and it must be a direct transfer from you to another person. The transferred certificates may be used with any other available discount for the purchase or lease of a new GM vehicle, except other rebate certificates distributed as part of this settlement and GM Employee Discount Programs, unless those programs are being extended to all customers.

12. Can I combine my rebate certificates or use them with other discount programs?

As long as you received your certificates directly through this settlement and they were not transferred to you from someone else, up to two rebate certificates may be used at one time towards the purchase or lease of one vehicle. Any additional certificates must be used toward the purchase or lease of another vehicle. You may also use your rebate certificates along with any other available discount programs, except the GM Employee Discount Programs, unless that program is being extended to all consumers.

13. Can I get out of the settlement?

No. Class Members were already given an opportunity in an earlier notice to exclude themselves from this class action. Class Members who did not previously submit an exclusion request may not be excluded from the settlement now. This means that you are legally bound by the class action and cannot sue GM about the claims in this lawsuit ever again.

14. What am I giving up as part of the settlement?

If the settlement becomes final, Class Members will be releasing GM from all of the claims described and identified in section 3 (D) of the [Settlement Agreement](#). This means you will not be able to sue GM regarding any of the claims described in the Settlement Agreement. The Settlement Agreement is available at www.onepercentcase.com. The Settlement Agreement describes the released claims with specific descriptions in necessary, accurate legal terminology, so read it carefully. You can contact the lawyers representing the Class (see Question 19) for free by calling the toll-free number or you can talk to your own lawyer, at your own expense, if you have any questions about the released claims or what they mean.

HOW YOU GET A REBATE CERTIFICATE—SUBMITTING A CLAIM FORM

15. How can I get my rebate certificate(s)?

To get your rebate certificate(s), you must submit a valid claim form. You may get a claim form on the internet at www.onepercentcase.com, or by sending a written request to:

Soders v. GM - Claim Form Request
PO Box 91196
Seattle, WA 98111-9296

QUESTIONS? CALL 1-888-866-1738 TOLL FREE, OR VISIT WWW.ONEPERCENTCASE.COM

Read the instructions on the claim form carefully, fill out the form, attach copies of any documents you may have, and mail it to the address on the form so that it is postmarked no later than **June 15, 2009**.

After you submit your claim form, you may be asked to provide additional information or documents.

16. What if I can't provide all of the requested information or documents?

If you are not able to complete every portion of the claim form or provide supporting documents, your claim may still be accepted, if: (1) you or a co-purchaser listed on your claim form appears on the list of new vehicle deliveries that GM produced in this case; or (2) you list a VIN that matches a qualifying new vehicle that was sold to you during one of the periods listed in Question 5 above.

If you are not on the list and you cannot provide documents or a qualifying VIN, but you complete all other sections of the claim form, you could receive a certificate worth \$200, \$100, or none at all, depending on how many other Class Members submit this type of undocumented claim. The certificate would be worth \$200 if 10% or less of all claims submitted are this type of undocumented claim, or \$100 if more than 10%, but less than 20%, are this type of undocumented claim. If more than 20% of all claims are this type of undocumented claim, you will not receive a certificate.

17. What if I purchased my vehicle with someone else?

If you purchased a vehicle with someone else and you both submit a claim form, the rebate certificate will be sent to: (1) the person whose name appears on the list of new vehicle deliveries; or (2) if none of your names appear on the list, the person whose name appears first on the purchase documents; or (3) if none of your names appear on the list and the purchase documents have not been provided, the person with the earliest postmark date for his or her claim form.

18. When would I get my rebate certificate(s)?

Your rebate certificate(s) will be mailed if the settlement is approved, and after any appeals are resolved. It is always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Everyone who sends in a claim form will be informed of the progress of the settlement, and updates will also be posted on www.onepercentcase.com. Please be patient.

THE LAWYERS REPRESENTING YOU

19. Do I have a lawyer in this case?

Judge Farina has decided that Joseph F. Roda and Michele S. Burkholder of RODANAST, P.C. in Lancaster, Pennsylvania are qualified to represent you and all Class Members. These lawyers are called "Class Counsel." You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your own expense.

20. How will the lawyers be paid?

You will not be personally charged for Class Counsel's fees or costs. Class Counsel will ask the Court to approve a payment to them of up to \$1,886,000 for attorneys' fees, for their work in investigating the facts, litigating the case, and negotiating the settlement. This is less than their actual fees from the eight and a half years they have been working on this case. They will also ask the Court to approve a payment of up to \$500,000 as reimbursement for the out-of-pocket expenses that they paid to litigate the case, and a payment of \$5,000 to the Class Representative, who helped the lawyers on behalf of the whole Class. The Court may award less than these amounts. These fees, costs and expenses will be paid separately by GM, as part of the

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settlement. These payments will not affect the amounts available for rebates. GM has agreed not to object to these requests for fees and costs.

21. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. However, you may hire your own lawyer at your own expense.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the settlement or some part of it.

22. How do I tell the Court that I do not like the settlement?

If you are a Class Member, you can object to the settlement if you do not like any part of it. The Court will consider your views. To object, you must send a letter via first class U.S. mail saying that you object to the *Soders v. GM* settlement. Be sure to include your name, address, telephone number, signature, and the reasons why you object to the settlement. Mail the objection no later than the extended deadline of **April 6, 2009** to:

Soders v. GM Class Counsel
RODANAST, P.C.
801 Estelle Drive
Lancaster, PA 17601

Any objections postmarked after that date may not be considered.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. You may attend and you may ask to speak, but you do not have to.

23. When and where will the Court decide whether to approve the settlement?

The Court will hold a Fairness Hearing at 9:00 a.m. on Tuesday, **April 28, 2009**, in Courtroom 10 at the Lancaster County Courthouse, 50 North Duke Street, Lancaster, Pennsylvania 17602. At this hearing, the Court will consider whether the settlement is fair, reasonable and adequate. If there are objections, the Court will consider them. Judge Farina will listen to people who have asked to speak at the hearing (see Question 25). After the hearing, Judge Farina will decide whether to approve the settlement. We do not know how long these decisions will take.

24. Do I have to come to the hearing?

No. Class Counsel will answer questions that Judge Farina may have. But you are welcome to come at your own expense, or pay your own lawyer to attend. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it.

25. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter via first class U.S. mail saying that it is your "Notice of Intention to Appear in *Soders v. GM*." Be sure to include

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your name, address, telephone number, and signature. Your Notice of Intent to Appear must be postmarked no later than the extended deadline of **April 6, 2009**, and must be sent to:

Soders v. GM Class Counsel
RODANAST, P.C.
801 Estelle Drive
Lancaster, PA 17601.

You may not be able to speak at the hearing if your Notice of Intent to Appear is not postmarked by that date.

IF YOU DO NOTHING

26. What happens if I do nothing at all?

If you do nothing, you will not receive a rebate certificate. You will be bound by all orders and judgments of the Court in this case, which means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against GM about the legal issues in this case.

GETTING MORE INFORMATION

27. How do I get more information?

This Notice summarizes the proposed settlement. More details are in a [Settlement Agreement](#). You can get a copy of the Settlement Agreement, and find answers to common questions about the settlement, a claim form, and other information, by visiting www.onepercentcase.com. You can also get more information by calling 1-888-866-1738, or by writing to:

Soders v. General Motors Corp.
PO Box 91196
Seattle, WA 98111-9296

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