

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

(Class action)
SUPERIOR COURT

No.: 500-06-001117-213

FRANÇOIS DÉCARY-GILARDEAU

Applicant

v.

**GENERAL MOTORS OF CANADA
COMPANY**

and

GENERAL MOTORS COMPANY

and

GENERAL MOTORS LLC.

Respondents

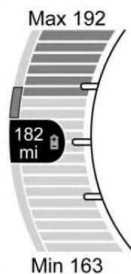
AFFIDAVIT

I, the undersigned, Jeremy Short, am an engineer for General Motors LLC and declare under oath that:

1. As part of my employment with General Motors LLC, I work in the Global Product Group and I am Vehicle Chief Engineer for the Chevrolet Bolt EV;
2. I have full knowledge of the functioning of the battery of the Bolt EV and Bolt EUV targeted in the present matter and can therefore attest to the following regarding the range of a fully charged battery of these vehicles;
3. I have read paragraph 2.67 of the *Demande remodifiée pour autorisation d'exercer une action collective et pour être représentant*, as well as the pictures filed as Exhibit R-7.8 of Mr. François Décary Gilardeau's dashboard:
 - (a) 4 of the pictures (R-7.8 parts 1, 3, 4 and 5) show a range while the vehicle is still connected to the charger;
 - (b) The 5th picture (R-7.8 part 2) shows the dashboard after the vehicle has been disconnected from the charger;

4. Mr. Décary-Gilardeau mentions in paragraph 2.67 that his 2017 Bolt EV does not reach a range of 383 kilometers;
5. This is normal as the range will vary depending on a number of factors, including the following:
 - (a) Outside temperature and climate;
 - (b) Driving habits;
 - (c) Vehicle maintenance;
 - (d) Driving conditions and terrain;
 - (e) Use of heating, ventilation, air conditioning and associated features;
6. As indicated in the owner's manual, the trend bar estimates how recent driving habits, conditions and climate settings are affecting the range prediction, as appears from **Exhibit GM-10**, Owner's Manual Excerpts, Battery Gauge, filed in support herewith:

Battery Gauge (High Voltage)



Enhanced Battery Gauge

This displays the high voltage battery state of charge. The value in the center is an estimate of how far the vehicle can be driven on the remaining charge as estimated from driving habits and conditions learned over several days.

The Max and Min values above and below the display indicate the longest and shortest possible range as estimated from current vehicle conditions and climate settings.

The mileage estimate and Max and Min numbers are affected by climate control system usage. Estimated range may increase or decrease based upon changes in climate control energy consumption.

A trend bar on the far left indicates how recent vehicle conditions and climate settings are affecting the learned range prediction.

When the high voltage battery state of charge is very low the estimated range value in the center will change to Low. Max and Min ranges will no longer be displayed. Additional alerts may display and a sound may also be heard at low state of charge.

Driver Efficiency Gauge



Modern Efficiency Gauge Shown, Classic Similar

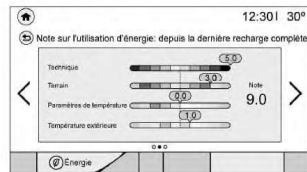
This gauge is a guide to driving in an efficient manner by keeping the ball green and in the center of the gauge. The outer ring of the speedometer may also change color to match the color of the efficiency gauge depending on the display layout.

Accel : If the ball turns yellow and travels above the center of the gauge, acceleration is too aggressive to optimize efficiency. Driving fast also uses more energy than driving slowly.

7. The various factors affecting the estimated range showed on the gauge are discussed in the owner's manual as appears from Exhibit GM-1.1:

et accessoires, Réglages de climatis. et Condit. de la batterie. Le schéma circulaire indique ces pourcentages. Énergie consommée et Distance parcourue sont également disponibles sur l'écran.

Résultats de consommation d'énergie



Cet écran affiche une estimation des facteurs influençant la consommation d'énergie depuis la dernière charge complète de la batterie haute tension. Un Résultats positif est souhaitable pour atteindre le score de consommation d'énergie optimale du véhicule.

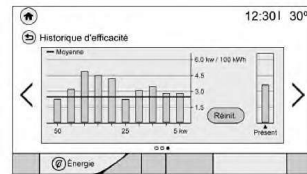
- **Technique** comprend les accélérations et les freinages.

- **Terrain** comprend les conditions routières telles que les collines, la pluie, la neige et peut être affecté par le vent et la pression des pneus.
- **Réglages de climatis.** comprend la manière d'utiliser le chauffage et la climatisation.
- **Températ. extérieure** comprend l'effet de l'air chaud ou froid sur l'aérodynamique du véhicule.
- **Résultats** correspond à la somme des résultats individuels.

Les résultats individuels permettent de comprendre les raisons pour lesquelles la consommation d'énergie est différente de jour en jour, y compris sur un même trajet emprunté régulièrement.

Toutes les valeurs sont réinitialisées après une charge complète et peuvent ne pas être stables avant d'avoir parcouru environ 16 km (10 miles).

Historique du rendement



Avec Historique du rendement, un graphique à barres indique la quantité moyenne d'énergie consommée sur les 50 derniers kilomètres ou miles. La barre Présent fournit le rendement énergétique moyen pour les 5 kilomètres ou miles actuels.

Toucher Réinitialisation pour effacer l'historique des données.

8. The impact of these factors on the vehicles' range is disclosed in advertisements. For example, Exhibit GM-7A states the following (p. 4):

2017 Bolt range based on GM preliminary testing. Full charge required. Actual driving range will vary based on temperature, driving conditions, and how you drive and maintain your vehicle.

See also Exhibits GM-7B at p. 1; GM-7C at p. 1; GM-7D at p. 2, 4, 6; GM-7E at p. 2, 4, 6.

9. In this case, the pictures have all been taken in winter months (January and February);
10. If on these days it was cold or very cold, this would certainly have an impact on the range of the vehicle;
11. Climate settings of the vehicle, which are not shown in these pictures, will also have an impact on the range of the vehicle;
12. For example, it is recommended to precondition the vehicle (e.g. launch heater/heated seats in the winter) while it is still charging to maximize range;
13. As the temperature rises, the range of the vehicle will in fact rise;
14. The 383 kilometers mentioned by Mr. Décary-Gilardeau is the GM estimated range which was developed in conformity of and using Government of Canada approved test methods;

15. As mentioned above, this estimated range is not shown in the pictures as a result of the outside temperature and possible other influencing factors;
16. All the facts contained herein are true to the best of my knowledge.

AND I HAVE SIGNED in Berkley, Michigan, on May 26, 2022:

E-SIGNED by Jeremy Short
on 2022-05-26 11:06:39 EDT

Jeremy Short

DECLARED UNDER OATH REMOTELY by
technological means before me at Vaudreuil-Dorion,
Québec, this 26th day of May, 2022.

E-SIGNED by Geneviève Paradis
on 2022-05-26 11:07:14 EDT

Geneviève Paradis
Commissioner for Oaths #224417
Commissioner for Oaths for Québec and for outside of Québec

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EXHIBIT GM-12

ORIGINAL

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