



January 25, 2024

DMV Autonomous Vehicle Program  
ATTN: Miguel Acosta  
MS L224  
P.O. Box 932342  
Sacramento, CA 94232  
miguel.acosta@dmv.ca.gov

Ms. Sophie Shulman  
Acting Administrator  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Ave S.E.  
Washington, D.C. 20590  
sophie.shulman@dot.gov

Terra Curtis, Director  
California Public Utilities Commission  
Consumer Protection and Enforcement Division  
505 Van Ness Avenue  
San Francisco, CA 94102-3214  
terra.curtis@cpuc.ca.gov

Re: October 2, 2023 Accident Involving a Cruise AV in San Francisco

Dear Ms. Shulman, Mr. Acosta and Ms. Curtis:

I am writing to transmit a copy of the "Report To the Boards of Directors of Cruise LLC, GM Cruise Holdings LLC, and General Motors Holdings LLC Regarding the October 2, 2023 Accident in San Francisco." This Report, dated January 24, 2024, was prepared by the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, and was presented to the Cruise Board yesterday for its consideration.

The Report contains the results of Quinn Emanuel's internal review of the facts and circumstances surrounding the October 2, 2023 accident at Market and 5th Streets in San Francisco and Cruise's subsequent interactions with regulators regarding that accident. Among other things, the Report presents facts and conclusions finding that Cruise's disclosures to regulators on October 3 were inadequate and that Cruise failed to live up to the expectations and requirements of regulators and the public.

Following Quinn Emanuel's presentation of its Report to the Cruise Board yesterday, after reviewing it and considering its findings and recommendations, the Board decided in full transparency to provide each of our regulators with the Report and to release it publicly. Consistent with Cruise's commitment to transparency with its regulators, other governmental officials, and the public regarding this issue, it has also elected to waive the attorney-client privilege with respect to (i) the public release of this otherwise privileged Report, and (ii) the communications to and from Cruise's in-house lawyers from October 2, 2023 through November 3, 2023 relating to the October 2 accident and Cruise's response to regulators about the October 2, 2023 accident. Our waiver is limited and is not intended to effectuate a broader waiver of any applicable privileges or other legal protections beyond the express terms set forth above. Among other things, this waiver does not extend to privileged communications to and from any of Cruise's outside law firms (including Quinn Emanuel), consultants, or to GM. Moreover, the limited waiver does not extend to privileged communications or documents generated by Cruise in-house lawyers on other subjects.

The Report underscores Cruise's mistakes and failings in response to the October 2 accident. On behalf of Cruise and its current leadership, we deeply regret our failures, and are committed to improving and working in partnership with our regulators, other government officials, and the public.

Respectfully submitted,

Craig Glidden  
President and Chief Administrative Officer  
Cruise LLC