### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

Jakuta Diodes, LLC,	§	
	§	
Plaintiff,	§	
	§	Case No. 6:16-cv-01180
<b>v.</b>	§	
	§	
<b>General Motors Company, a Delaware</b>	§	
corporation,	§	JURY TRIAL
	§	
Defendant.	§	
	§	
	§	
	§	

#### FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Jakuta Diodes, LLC, ("Jakuta" or "Plaintiff"), by and through its undersigned counsel, for its First Amended Complaint against Defendant General Motors Company ("Defendant") makes the following allegations. These allegations are made upon information and belief.

#### NATURE OF THE ACTION

1. This is an action against Defendant for infringement of one or more claims of United States Patent No. 6,079,854 ("the '854 Patent").

#### **PARTIES**

- 2. Plaintiff Jakuta Diodes, LLC is a Texas limited liability company with its principal office located in Texas, at 211 East Tyler Street, Suite 600-A, Longview, Texas 75601.
- 3. Defendant General Motors Company is a corporation incorporated under the laws of the State of Delaware, which can be reached through its agent for

service of process, The Corporation Company located at 30600 Telegraph Road, Suite 2345, Bingham Farms, Michigan 48025.

#### JURISDICTION AND VENUE

- 4. This patent infringement action arises under the patent laws of the United States, including 35 U.S.C. §§ 271, et seq.
- 5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § § 1331 and 1338(a) because it arises under United States Patent law.
- 6. This Court has personal jurisdiction over the Defendant because it (either directly or through its subsidiaries, divisions, groups or distributors) has sufficient minimum contacts with the forum as a result of business conducted within the State of Texas and this district; and/or specifically over the Defendant (either directly or through its subsidiaries, divisions, groups or distributors) because of its infringing conduct within or directed at the State of Texas and this district.
- 7. Venue is proper in this district pursuant to 28 U.S.C. §1391(c) and 1400(b).

#### **FACTS**

- 8. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,079,854 ("the '854 Patent"), entitled "Device and Method for Diffusing Light," which was duly and legally issued on June 27, 2000 by the United States Patent and Trademark Office ("USPTO").
  - 9. A copy of the '854 Patent is attached to this Complaint as Exhibit A.
  - 10. The claims of the '854 Patent are valid and enforceable.

# COUNT I: CLAIM FOR PATENT INFRINGEMENT UNDER 35 U.S.C. § 271(a) ('307 PATENT) (AGAINST DEFENDANT)

- 11. Plaintiff hereby incorporates by reference the allegations of paragraphs 1 through 10 of this Complaint as if fully set forth herein.
- 12. Defendant makes, has made, sells, offer for sale, uses and/or imports into the United States, motor vehicles that include LED headlamps, including

without limitation the Advance Forward Lighting feature sold by Defendant in its Cadillac Escalade vehicle line ("Accused Product(s)").

- 13. Each of the Accused Product(s) uses a method of diffusing light, including providing a light source from which light radiates, namely a LED. See Exhibit B.
- 14. Each of the Accused Products interrupts the light with a substantially transparent member, including utilizing four vertically stacked crystal lenses and LEDs. See Exhibit B.
- 15. Each of the Accused Products segregate a substantial portion of the light to a plurality of channels within the member, including utilizing four vertically stacked crystal lenses as the secondary optics. These lenses work on the principle of Total Internal Reflection (TIR), wherein light from an LED's central axis enter and exit through a refractive lens. See Exhibit B.
- 16. On information and belief, each of the Accused Products disperses the light transmitted in a widening ray along the plurality of channels utilizing four vertically stacked crystal lenses as the secondary optics. These lenses work on the principle of Total Internal Reflection (TIR), wherein light from an LED's central axis enter and exit through a refractive lens, allowing for the beam to be sculpted to a desired width. See Exhibit B.
- 17. Each of the Accused Products also radiates a diffused pattern of light emitted from the plurality of channels utilizing four vertically stacked crystal lenses as the secondary optics. These lenses work on the principle of Total Internal Reflection (TIR), wherein light from an LED's central axis enter and exit through a refractive lens to illuminate the roadway. See Exhibit B.
- 18. Each one of the elements of the Accused Product(s), itemized in paragraphs 13-17 above, is an element in Claim 27 of the '854 patent.
- 19. Thus, each of the Accused Products infringes at least Claim 27 of the '854 patent.

- 20. Plaintiff has been, and will continue to be, irreparably harmed by Defendant's ongoing infringement of the '854 patent.
- 21. As a direct and proximate result of Defendant's infringement of the '854 Patent, Plaintiff has been and will continue to be damaged in an amount yet to be determined, including but not limited to Plaintiff's lost profits and/or a reasonable royalty.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

- A. In favor of Plaintiff that Defendant has infringed one or more claims of the '854 Patent, either literally or under the doctrine of equivalents;
- B. Requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '854 Patent as provided under 35 U.S.C. § 284, but not less than a reasonable royalty; and
  - C. For such other and further relief as may be just and equitable.

#### **DEMAND FOR TRIAL BY JURY**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a jury trial on all issues and causes of action triable to a jury.

DATED: October 4, 2016 Respectfully submitted,

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**Patent Number:** 

2/1987 Heiler.

7/1991 Jurgens .

### United States Patent [19]

#### Jun. 27, 2000 **Date of Patent:** [45]

1/1990 Matsumoto et al. .

6,079,854

362/342

Ra

[11]

4,644,448

4,743,082

4,891,559

5,032,955

5,113,321

5.122.940

5,191,264

[54]	DEVICE AND METHOD FOR DIFFUSING LIGHT
[76]	Inventor: <b>Dojin Ra</b> , 101 E. Edsall Ave., #C5, Palisades Park, N.J. 07650
[21]	Appl. No.: 09/023,528
[22]	Filed: <b>Feb. 13, 1998</b>
[51] [52] [58]	Int. Cl. <sup>7</sup> F21V 8/00 U.S. Cl. 362/342; 362/342; 362/301; 362/346; 362/297; 362/351; 362/362; 362/355; 362/356; 362/360; 362/329; 362/328; 362/308; 362/309; 362/551; 362/552; 362/554 Field of Search 362/342, 301, 362/346, 297, 351, 362, 355, 356, 360, 329, 328, 308, 309, 551, 552, 554

**References Cited** 

U.S. PATENT DOCUMENTS

	5,810,469	9/1998	Weinreich	•••••		•••••	362/34
	imary Exam						
	sistant Exar						
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[5]	7]		ABSTRA	СТ			

3/1993 Hammond.

A device is provided to diffuse a beam of light, the device consisting of a plurality of truncated cells nested together along their respective sidewalls for collecting and diffusing the light rays as they extend along the plurality of cells having an expansive, tapered interior volume. The device diffuses the main light beam in a headlamp, for example, thereby substantially reducing the glare experienced by oncoming drivers and permitting high beams of the headlamp to be used in the presence of the oncoming drivers. The device of the present invention is retrofitable to existing headlamps. In another embodiment of the present invention, a concave lens is disposed in the headlamp assembly to diffuse the main light beam prior to it entering the truncated cells, while each one of the cells of the dispersion device is also provided with its own respective concave lens to augment the diffusing effect.

3,735,114 4,112,483 9/1978 Small, Jr. et al. ...... 362/301 2/1979 Hulbert, Jr. . 4,142,229

4,191,990 3/1980 Beeftink et al. 4,458,303 7/1984 Berns.

9/1970 Klie et al. .

5/1973 Porsche.

5/1973

1/1973 Riehl et al. .

Porsche .

4,482,939 11/1984 Tishman . 4,559,589 12/1985 Sassmannshausen .

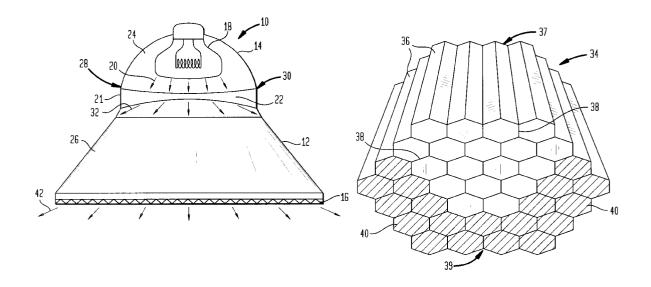
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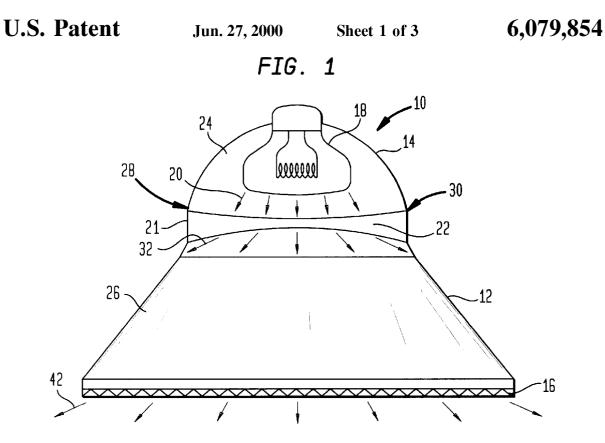
3,526,764

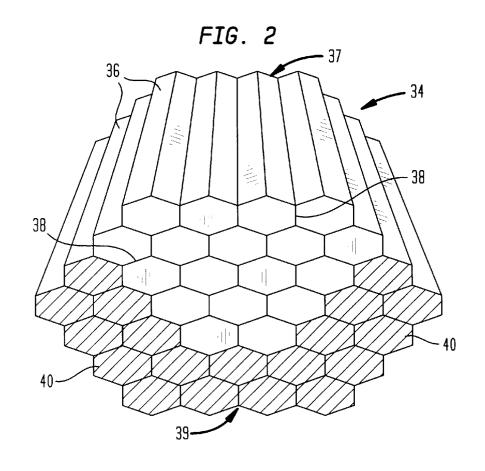
3,710,093

3,731,079

#### 27 Claims, 3 Drawing Sheets





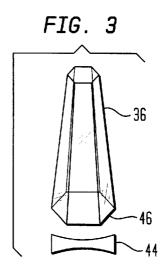


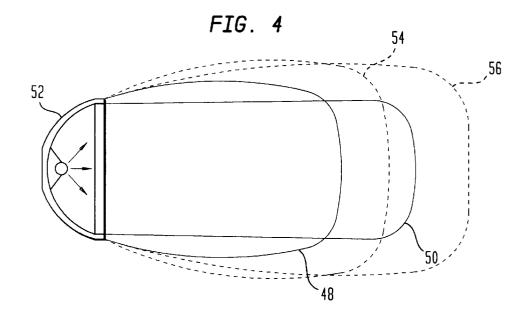
U.S. Patent

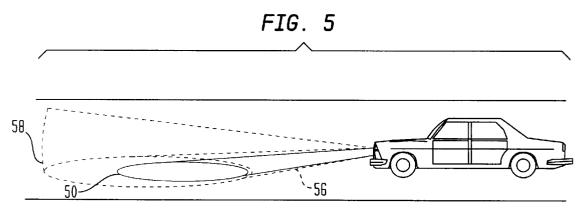
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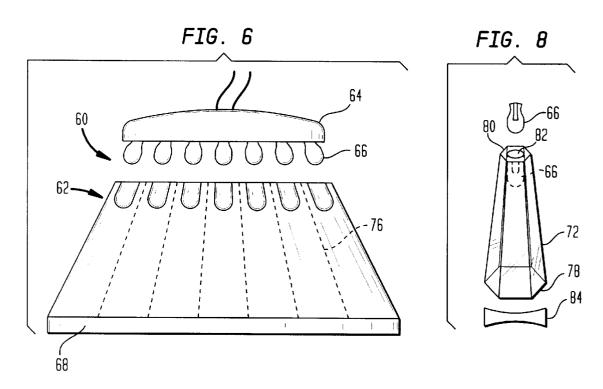


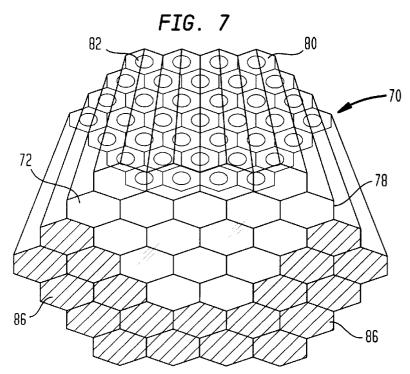
U.S. Patent

Jun. 27, 2000

Sheet 3 of 3

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#### 1

#### DEVICE AND METHOD FOR DIFFUSING LIGHT

#### BACKGROUND OF THE INVENTION

#### 1. Field of the Invention

The present invention relates to automobile lighting fixtures and methods for directing and diffusing light emitted from the fixtures.

#### 2. Discussion of the Related Art

Automobile headlights and methods for controlling and shaping a light beam are disclosed in the following patents:

U.S. Pat. No.	Inventor(s)
3,526,764	Klie et al
3,710,093	Riehl et al
3,731,079	Porsche
3,735,114	Porsche
4,142,229	Hulbert, Jr.
4,191,990	Beeftink et al
4,458,303	Berns
4,482,939	Tishman
4,559,589	Sassmannshausen
4,644,448	Heiler
4,891,559	Matsumoto et al
5,032,955	Jurgens
5,191,264	Hammond

U.S. Pat. No. 3,526,764 to Klie et al discloses a retractable motor headlight arrangement consisting of a lens having a 30 prism profiled surface for directing light beams from the vehicle headlight in the direction of travel, i.e. for bending the light beams toward the direction of travel.

U.S. Pat. No. 4,142,229 to Hulbert, Jr. discloses a method of shaping a light beam wherein a sealed beam lamp lens 35 by oncoming drivers, regardless of whether the headlight cover is composed of a number of different optical light control elements, such as prisms or cylindrical lenses, areas of which are systematically covered so that maximum candela requirements are not exceeded.

U.S. Pat. No. 4,458,303 to Berns discloses a light beam concentrating, intensifying and filtering device, wherein a parallel ray light source of the parabolic reflector type is employed in association with a leaf shutter, not unlike that used in conventional cameras, to vary the beam of light.

U.S. Pat. No. 4,559,589 to Sassmannshausen discloses a lighting fixture with a concave reflector such as a tail light, warning or signal light, etc., wherein a reflector for the light is provided with slits through which light passes to contact a prism for scattering the light.

U.S. Pat. No. 5,032,955 to Jurgens discloses a mud flap mounted vehicle reference lighting system wherein a plurality of lamps are mounted to a parabolic reflector for coaction with a louver to effectively position the light pattern at a desirable location observable to the driver.

The remaining patents to Riehl, Porsche, Beeftink, Tishman, Heiler, Matsumoto, and Hammond disclose apparatus and systems which relate generally to the present invention and are directed toward manipulating the headlamp assembly with respect to the road and other vehicles in 60 the area.

The known devices include intricate and complex structures which are not retrofitable to existing light fixtures without substantial structural modification of the fixture. Certain of the devices, such as that disclosed in Hulbert, Jr., 65 teach to cover or coat portions of the lens cover of the device to reduce candela and glare.

#### 2

In addition, the lighting fixtures discussed above rely substantially on flutes, prisms and lenses only to direct the light from the luminous element, which results in erratic, uncontrolled scattering of the light, not necessarily in the desired direction.

Among the patents above, the devices and methods disclosed do not include a structure mountable within a housing for the light fixture, which structure consists of a plurality of truncated hollow cells ganged together to diffuse the light emitted from a luminous body for the light fixture. The device of the present invention also provides for controlled diffusion of the light beam.

The present invention also provides for structure which permits increased candela for the light beam without the detrimental side effect of increased glare associated with the known light fixture devices. Therefore, the diffusion of the light beam emitted from the present invention will be compensated for by the device permitting an increase in the maximum candela emitted by the luminous body of the light fixture.

#### OBJECTS AND SUMMARY OF THE INVENTION

It is an object of the present invention to provide a device and method for directing a light beam, and more particularly, to diffuse a light beam emitted from an automobile headlight.

It is another object of the present invention to provide a device which permits use of a luminous body having increased candela without a corresponding amount of glare.

It is another object of the present invention to provide a diffusing element which substantially reduces, if not eliminates, the blinding glare from headlamps experienced fixture is in low or high beam mode.

It is another object of the present invention to provide a light beam diffuser which provides an increased zone of coverage by the light beam, whether in the low beam or high beam mode.

It is another object of the present invention to provide a lighting fixture for an automobile wherein the fixture includes a plurality of luminous bodies, each one of which operatively coacts with a corresponding cell of the diffuser device for diffusing light emitted from the illuminating

It is another object of the present invention to provide a light diffuser device consisting of a plurality of cells which when ganged together coact to provide a synergistic effect for diffusing light emitted from a luminous body.

It is another object of the present invention to provide a head lamp housing consisting of a light diffuser device of the present invention in combination with a concave lens to interrupt and gather a secondary beam of light for further diffusion.

It is another object of the present invention to provide a light diffuser device consisting of a plurality of cells in each one of which there is disposed a concave lens for further diffusion of the light transmitted from each one of the plurality of cells.

It is another object of the present invention to provide a diffuser device consisting of a plurality of cells ganged together in a configuration for certain of the cells to be angled with respect to the remaining cells to intersect the diffused light being emitted from the device to reduce the glare of the resulting light beam.

3

It is another object of the present invention to provide a diffuser device consisting of a plurality of cells in each one of which is disposed a concave lens angled with respect to a longitudinal axis of the respective cell to effect diffusion of the light beam being emitted from the particular cell.

The foregoing objects are examples only of the objects and resulting advantages that are obtained from the diffuser device and method of the present invention.

The objects of the present invention are realized by providing a device and method for diffusing a light beam which consists of a truncated body having: a first truncated region at a first side of the truncated body for receiving light from the luminous body; a second truncated region at a second side of the truncated body substantially opposite to the first side and adapted for emitting light; and a central region interconnecting the first and second truncated regions and adapted for diffusing the light transmitted along the central region for providing a diffused pattern of light emitted from the second truncated region.

#### BRIEF DESCRIPTION OF THE DRAWINGS

For a more complete understanding of the present invention, reference may be had to the description of the preferred embodiments taken in conjunction with the 25 accompanying drawings, of which:

- FIG. 1 is a view showing an embodiment of a light diffuser device of the present invention disposed in a light fixture assembly;
- FIG. 2 is a perspective view of another embodiment of a <sup>30</sup> light diffuser device according to the present invention for being disposed in the light fixture assembly of FIG. 1;
- FIG. 3 is a perspective view of a single cell of the diffuser device shown in FIG. 2;
- FIG. 4 is a top plan view showing diagrammatically the disposition and scope of high and low beams produced by the present invention, as compared to high and low beams produced by conventional headlight fixtures;
- FIG. **5** is a side view of a motor vehicle showing dia-40 grammatically the disposition and scope of the light beam produced according to the present invention, as compared to the light beam produced by conventional headlight fixtures;
- FIG. 6 is a view of another embodiment of a light fixture assembly for the present invention;
- FIG. 7 is a perspective view of still another embodiment of a light diffuser device according to the present invention for being disposed in the light fixture assembly of FIG. 6; and
- FIG. **8** is a perspective view of another embodiment of a  $^{50}$  single cell of the diffuser device shown in FIG. 7.

## DESCRIPTION OF THE PREFERRED EMBODIMENTS

Referring to FIG. 1, a light beam diffusing headlamp assembly of the present invention is shown generally at 10. The assembly 10 includes a housing 12 having at one end a reflecting surface 14 or reflector, such as known in the art, and a lens cover 16 at an opposite end of the housing 12. A luminous body 18, such as a light bulb, extends through a rear wall portion of the housing 12 and the reflector 14 to coact with the reflector 14 to provide a primary light beam indicated generally by arrows 20.

A first diffuser means 22 constructed as a concave lens is 65 36 nested together. disposed in the housing 12 between the reflector 14 and the lens cover 16. The construction and arrangement of the scope, respectively,

4

concave lens 22 is to divide an interior of the housing 12 into a primary chamber 24 and a secondary chamber 26 of the housing. In a preferred construction, the concave lens 22 is of a length sufficient to span the interior of the housing 12 such that opposed ends 28,30 of the concave lens 22 abut corresponding portions of the inner surface of the housing 12 to segregate the primary chamber 24 from the secondary chamber 26. In another preferred embodiment, a peripheral edge 21 of the lens 22 abuts continuously against an inner 10 surface of the housing 12. In still another preferred embodiment, the reflector 14 is disposed in the housing 12 to extend completely along an inner surface of the housing in the primary chamber 24. The primary light beam 20 passes through the concave lens 22 to be diffused further into the secondary chamber 26 as a secondary light beam indicated generally by arrows 32.

The secondary chamber 26 of the housing 12 is sized and shaped to receive a second light diffuser means 34, which is shown in FIG. 2.

Referring to FIGS. 2 and 3, the light beam diffuser device 34 resembles a truncated body or mass, and is constructed from a plurality of truncated hollow receptacles 36 or cells, each one of which has a hexagonal-shaped cross-section. The cross-section of the plurality of receptacles 36 resembles a honeycomb. The receptacles 36 have a tapered diameter, shown more particularly in FIG. 2. That is, the widest portion of each one of the cells 36 faces the lens cover 16, with each one of the cells tapering to a reduced diameter as it extends toward the bulb 16 of the headlamp 10. The narrowest end of each one of the cells 36 collectively forms a light receiving region shown generally at 37. The widest end of each one of the cells 36 collectively forms a light transmitting region shown generally at 39.

The cells 36 are nested or ganged together along their respective sidewalls 38, as shown in FIG. 2, so that preferably, none of the secondary light 32 is permitted to pass between the abutting sidewalls of the respective cells 36. The ganged arrangement of a plurality of the individual cells 36 is constructed to have a cross-section resembling a honeycomb as well, such as shown in FIG. 2.

The truncated cells 36 can be manufactured of substantially any material, provided the material is heat resistant to the effects of light emitted from the bulb 18. The material to construct the cells 36 is preferably substantially opaque, but can be translucent.

The individual construction of each cell 36 and the ganged arrangement 34 of a plurality of the cells 36 is to provide a radiating honeycomb to diffuse the light rays 20,32.

The tapering effect of the cells 36 of the ganged arrangement shown in FIG. 2 results in a longitudinal axis along each one of the cells 36 tapering toward each other to a common origin. In another embodiment, certain cells 40 indicated with cross-hatching are at a slightly different angle than the remaining cells 36. This provides for still further dispersion of a headlamp beam indicated by arrows 42.

In FIG. 3, an individual cell 36 is shown having a concave lens 44 dispersed therein. The concave lens 44 is constructed to be disposed at a wider opening 46 of the cell 36. This provides for still further diffusion of the light emitted from each one of the individual cells 36.

FIGS. 4 and 5 show the result of employing the light diffusing device 10 having a plurality of the truncated cells 36 nested together.

In FIG. 4, solid lines 48,50 show low 48 and high 50 beam scope, respectively, for an automobile headlamp 52 employ-

4

ing conventional headlight construction. In contrast, broken lines 54,56 show the disposition and scope of a lighted area for low 54 and high 56 beams, respectively, that are obtained when the diffuser devices 22 and/or 34 of the present invention are employed.

In FIG. 5, the dispersion of the light beam 56 produced by the present invention provides for an extended field 58 of light projected further from the front of the vehicle than the conventional high beam 50. There is therefore less of a chance of an automobile driving beyond the reach of its headlamp beam. The device also increases the ability to read signage from a further distance as a result of the field 58.

The plurality of truncated cells **36** nested together in an array disperses the light and therefore, substantially reduces the glare experienced by oncoming drivers. In addition, the array of nested, truncated cells **36** permits the user to drive with both high and low beams, since the light beams are sufficiently diffused to substantially reduce the glare normally experienced by oncoming drivers. With this arrangement of cells **36**, a bulb **18** having higher candela output can be employed without the associated excessive glare that occurs in conventional lamp structures. Another embodiment of the present invention is shown in FIGS. **6–8**. The embodiment and elements thereof as shown in FIGS. **6–8** operate to provide a similar light diffusing result and attendant advantages, unless otherwise stated.

In FIG. 6, another embodiment of a light beam diffusing headlamp assembly in the present invention is shown generally at 60. The assembly 60 includes a housing 62 having a reflector 64 and a plurality of luminous bodies 66, i.e bulbs, which extend to an interior of the housing. The housing also includes a lens cover 68 mounted to the housing at an end opposite to the reflector 64. A concave lens (similar to lens 22) disposed in the housing can also be employed with this embodiment.

A plurality of light bulbs **66** are provided to each extend into the housing **62** to a corresponding cell of another embodiment of the light diffuser means shown generally at **70** in FIG. **7**. The embodiment of FIG. **7** provides advantages similar to those discussed with reference to FIG. **5**.

The light diffuser means **70** is constructed of a plurality of individual cells **72** which have a hexagonal-shaped cross-section, as that shown with respect to FIGS. **2** and **3**. As shown in FIG. **7**, the plurality of cells **72** are ganged together along their respective sidewalls **74** into a body or mass having a hexagonal-shaped cross-section. The light diffuser means **70** is sized and shaped to be disposed in the housing **62**, with broken lines **76** of FIG. **6** representing generally the disposition of the diffuser means **70** in the housing **62**.

Each one of the cells 72 from which the diffuser means 70 is composed, has a truncated shape with a wider opening 78 extending to an end wall 80, having a width less than a width of the opening 78. The end wall 80 of each one of the cells is provided with an aperture 82 which is constructed and arranged to receive a corresponding one of the bulbs 66. The coaction between an individual bulb 66 and a corresponding cell 72 is shown in FIG. 8.

The diffuser means 70 can also include a plurality of concave lenses 85 which are sized and shaped to be received 60 at the wider opening 78 of each one of the cells 72. This construction provides for a further dispersing of the light rays transmitted through each one of the cells.

In FIG. 7, certain of the cells 72 are cross-hatched at 86. The cells 86 are arranged at a slightly different angle than the 65 remaining cells 72 for providing a further diffusing effect similar to that discussed with respect to FIG. 2. The arrange-

6

ment of these cells **72** at an angle slightly different with respect to the remaining cells provides for further diffusion of the light beam, thereby promoting the advantage that high beams as well as low beams can be used by the vehicle without exposing the oncoming driver to adverse glare effects.

The material from which the light diffuser device is constructed is similar to that discussed with respect to the embodiment in FIG. 2.

It will be understood that the embodiments described herein are merely exemplary and that a person skilled in the art may make many variations and modifications without departing from the spirit and scope of the invention. All such modifications and variations are intended to be covered by the appended claims.

What is claimed is:

- 1. A light fixture, comprising:
- a housing having:
- a front end,
  - a back end opposite to the front end, and
  - a sidewall interconnecting the front end and the back end for providing an interior space of the housing,
  - an opening in the front end communicating with the interior space;
- a reflector disposed at the back end and facing the front end;
- a light source extending through the back end of the housing and the reflector to be operatively associated with the reflector at the interior space of the housing;
- a transparent cover extending across the opening at the front end of the housing;
- a concave lens disposed within the housing between the light source and the front end of the housing, the concave lens having:
  - a peripheral edge for abutting against an inner surface of the housing,
  - a receiving surface facing the light source, and
  - a transmitting surface opposite to the receiving surface and facing the opening at the front end of the housing;
- a first region in the housing occupying an area between the reflector and the receiving surface of the concave lens and into which light from the light source is radiated to impact the receiving surface of the concave lens; and
- a second region in the housing occupying an area between the transmitting surface of the concave lens and the front end of the housing, the second region segregated into a plurality of channels into which light from the concave lens is radiated to provide a diffused pattern of dispersed light to exit the front end of the housing.
- 2. A light fixture, comprising:
- a housing having:
- a front end,
- a back end opposite to the front end, and
- a sidewall interconnecting the front end and the back end for providing an interior space of the housing,
- an opening in the front end communicating with the interior space;
- a reflector disposed at the back end and facing the front end;
- a light source extending through the back end of the housing and the reflector to be operatively associated with the reflector at the interior space of the housing;
- a transparent cover extending across the opening at the front end of the housing;

7

- a truncated body disposed within the housing between the light source and the front end of the housing, the truncated body having:
  - a plurality of hexaganolly-shaped hollow cells nested together along respective sidewalls of the cells,
  - each one of the plurality of cells having a first end terminating at a receiving surface facing the light source, and
  - a second end opposite to the first end and terminating in a transmitting surface facing the opening at the 10 front of the housing.
  - wherein a diameter of the receiving surface is less than a diameter of the transmitting surface of the truncated body;
- a first region in the housing occupying an area between 15 the reflector and the receiving surface of the truncated body and into which light from the light source is radiated to impact the receiving surface of the truncated body; and
- a second region in the housing occupying an area between 20 the transmitting surface of the truncated body and the front end of the housing and into which light from the truncated body is radiated in a diffused pattern to exit the front end of the housing.
- 3. A light fixture, comprising:
- a housing having an interior region extending to an opening for the housing;
- means for illuminating the housing operatively associated with the interior region of the housing; and
- means for diffusing light emitted from the illuminating means, the diffusing means comprising:
- a body portion having:
  - a first end for receiving light from the illuminating means,
  - a second end opposite to the first end and facing the opening of the housing for radiating light to the opening, and
  - a plurality of channels tapering outward toward the second end, and extending between the first end and the second end for diffusing light transmitted therethrough from the first end to the second end,
  - wherein the light radiated from the second end is in the diffused pattern to exit the opening of the housing.
- 4. The light fixture according to claim 3, further comprising:
  - a reflector disposed at the interior region of the housing and in operative association with the illuminating means for reflecting light at the interior region toward the diffusing means.
- 5. The light fixture according to claim 3, further comprising:
  - a concave lens disposed between the illuminating means and the diffusing means.
- **6.** The light fixture according to claim **5**, further comprising:
  - a first region in the housing between the illuminating means and the diffusing means and into which light from the illuminating means is radiated to impact a first surface of the concave lens, and
  - a second region in the housing between a second surface of the concave lens opposite to the first surface and the opening for the housing and into which light from the concave lens is radiated in a diffused pattern to exit the opening at the front end of the housing.
- 7. The light fixture according to claim 3, wherein each one of the plurality of channels extends along a respective one of

8

the hollow cells which are nested together along their respective sidewalls.

- 8. The light fixture according to claim 7, wherein each one of the plurality of cells has a hexagonal-shaped cross-section.
- **9.** The light fixture according to claim **3**, wherein a diameter of the first end of the body portion facing the illuminating means is less than a diameter of the second end of the body portion facing the opening of the housing.
- 10. The light fixture according to claim 3, wherein the diffusing means has a hexagonal-shaped cross-section.
- 11. The light fixture according to claim 7, wherein a diameter of each one of the cells increases from the respective first end through to the respective second end of the cell.
- 12. The light fixture according to claim 7, wherein each one of the plurality of cells includes a longitudinal axis which intersects longitudinal axes of the remaining cells beyond the receiving end of the body portion.
- 13. The light fixture according to claim 3, further comprising:
  - secondary means for diffusing light, the secondary diffusing means disposed between the diffusing means and the opening of the housing for further diffusion of light to exit from the housing.
- 14. The light fixture according to claim 7, wherein each one of the hollow cells includes:
  - a secondary diffusing means disposed at the second end of each one of the cells.
- 15. The light fixture according to claim 14, wherein the secondary diffusing means comprises:
- a concave lens.
- 16. The light fixture according to claim 15, wherein select ones of the cells are angularly offset with respect to the remaining cells of the body portion for further diffusing light radiated from the body portion.
- 17. The light fixture according to claim 3, wherein the illuminating means comprises:
  - a plurality of bulbs constructed and arranged to extend into the interior region of the housing for insertion into a corresponding one of the plurality of the channels.
- 18. In a light fixture consisting of an open-ended housing, a reflector disposed at a first end of the housing away from the opening, and a light source disposed at an interior of the housing for operative association with the reflector, a diffuser device adapted to be disposed at the interior of the housing, the device comprising:
  - a plurality of truncated cells nested together, each one of the truncated cells including:
    - a first end with a first opening having a first diameter for facing the light source,
    - a second end with a second opening having a second diameter greater than the first diameter for facing the opening of the housing, and
    - a hexagonally-shaped sidewall extending between the first and second ends of the truncated cell and tapering from the second end to the first end of the truncated cell.
  - wherein the construction and arrangement of the plurality of truncated cells provides the diffuser device with a hexagonal-shaped cross-section for light from the light source to be received at the first openings of the plurality of truncated cells and transmitted through the plurality of truncated cells in a diffused pattern for radiation from the second openings of the truncated cells to exit the housing.
  - 19. A device for diffusing light from a luminous body, the device comprising:

**EXHIBIT A** 

#### 6,079,854

9

- a truncated body having:
  - a first truncated region at a first side of the truncated body for receiving light from the luminous body;
  - a second truncated region at a second side of the truncated body substantially opposite to the first side 5 and adapted for emitting light; and
  - a central region interconnecting the first and second truncated regions, the central region increasing in diameter from the first truncated region to the second truncated region and adapted for diffusing the light 10 transmitted along the central region for providing a diffused pattern of light emitted from the second truncated region.
- **20**. The diffuser device according to claim **19**, wherein the first and second truncated regions and the central region 15 each have a hexagonal-shaped cross-section.
- 21. The diffuser device according to claim 20, wherein the truncated body comprises:
  - a plurality of hollow cells nested together, each one of the plurality of cells having:
    - a first end terminating at the first truncated region, and
    - a second end terminating at the second truncated region.
- 22. The device according to claim 21, wherein each one of the plurality of cells has a hexagonal-shaped cross- 25 section
- 23. The device according to claim 21, wherein the first end of each one of the plurality of cells has a first diameter and a second end of each one of the plurality of cells has a second diameter greater than the first diameter.
- 24. The device according to claim 21, wherein each of the cells comprises:
  - an opening at the first end thereof, the openings constructed and arranged for receipt of an individual illuminating means.

10

- 25. The device according to claim 21, wherein select ones of the plurality of cells are angularly offset with respect to the remainder of the plurality of cells in the truncated body.
  - **26**. A method of diffusing light, comprising the steps of: providing a light source from which light radiates;

containing the light radiated to a first region;

interrupting the light with a concave lens in the first region;

transmitting the light from the first region in a first diffused pattern through the concave lens;

radiating the first diffused pattern of light emitted from the concave lens to a second region;

containing the first diffused pattern of light emitted from the concave lens to the second region;

interrupting the light with a truncated body in the second region;

transmitting the light from the second region in a second diffused pattern through the truncated body;

dispersing the diffused pattern of light in a widening ray;

radiating the second diffused pattern of light emitted from the truncated body.

27. A method of diffusing light, comprising the steps of: providing a light source from which light radiates;

interrupting the light with a substantially transparent member;

segregating a substantial portion of the light to a plurality of channels within the member;

dispersing the light transmitted in a widening ray along the plurality of channels; and

radiating a diffused pattern of light emitted from the plurality of channels.

\* \* \* \* \*



NEXT GENERATION 2015

## ESCALADE





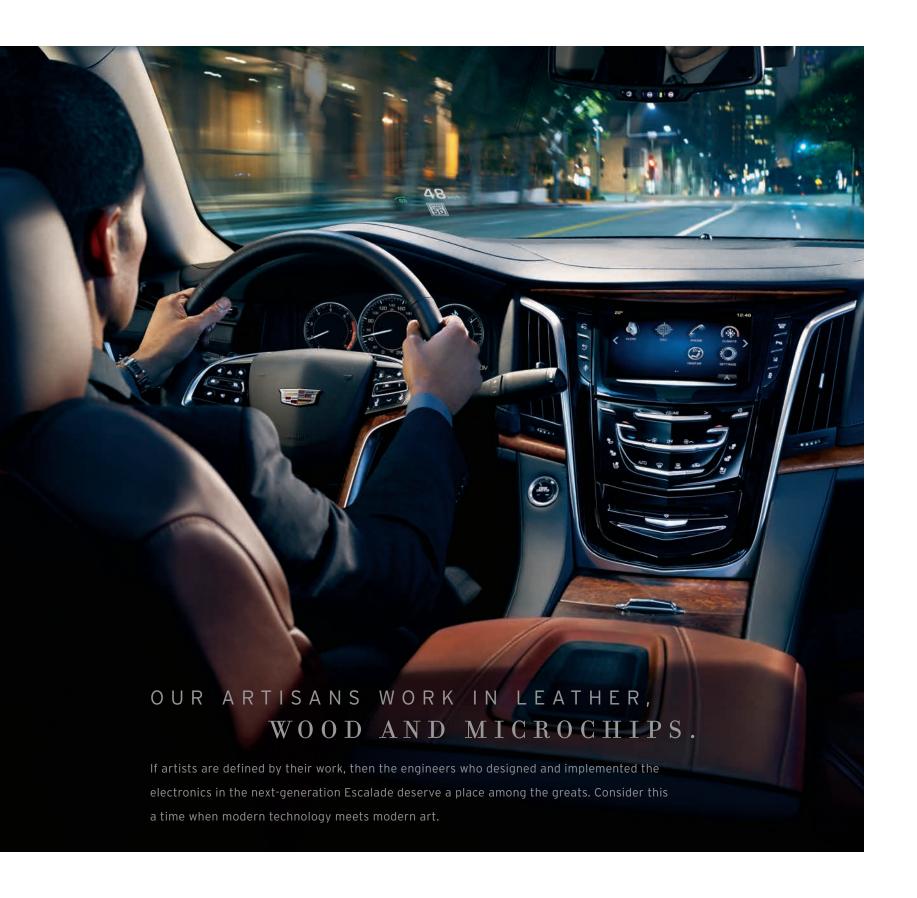


Escalade Premium Collection / Shale with Cocoa Accents and American Walnut Trim

## OUR CROWN JEWEL, CUT AND CRAFTED TO FORM.

Finding the perfect elements to create a uniquely Escalade interior required searching the world over, so we did just that. With the finest materials in hand, 11 interior artisans endeavoured to capture the essence of absolute luxury by dramatically layering fabrics and textures specifically chosen to complement one another. The hand-wrapped and cross-stitched heated steering wheel, dressed in leather, adds a personal touch. Exceptionally comfortable and supportive leather seating surfaces create a new level of sophistication. Even the centre console, armrest and instrument panel trim are taut, cut-and-sewn masterpieces.





IN EAD - UP DISPLAY The available reconfigurable Head-Up Display offers a full-colour interface that conveniently projects desired information – such as speed, engine rpm, navigation and more – on the windshield in your natural line of sight. RECONFIGURABLE

DISPLAY Customize your 12.3" diagonal LCD gauge display to one of four personas that mixes traditional vehicle data with navigation, entertainment and detailed 3-D vehicle images. BOSE\*

CENTERPOINT\* SURROUND SOUND SYSTEM This 16-speaker system features Advanced Staging Technology, an innovation that creates an immersive sound that brings you the feeling of being front row, centre stage. CUE\* Displayed on an intuitive screen, CUE¹
Cadillac User Experience\* – functions like a tablet with touch features, device synchronization and Enhanced Voice Recognition. NAVIGATION Standard navigation² brings constantly updated maps to your 8" diagonal CUE touch screen. REAR-SEAT ENTERTAINMENT

SYSTEM Standard on the Premium and Platinum Collections and available on the Luxury

Collection, our entertainment system features a large 9" screen (two screens in ESV), along with Blu-ray\* playback. Available ONSTAR 4G LTE\* with Wi-Fi.\* This high-speed, highly reliable 4G LTE connection delivers an enhancement to current OnStar services and is capable of



connecting up to seven mobile

devices<sup>4</sup> for streaming customized

content. **WIRELESS CHARGING**<sup>5</sup> With this station

conveniently located on the centre

console, you can inductively charge

your compatible phone and certain

other mobile devices anytime the

vehicle is running.

1. CUE functionality varies by model. Full functionality requires compatible Bluetooth and smartphone, and USB connectivity for some devices. Visit CUE.Cadillac.ca for more details. 2. At time of printing, detailed map coverage is available for most major urban areas of the United States and for certain metropolitan areas of Canada (Vancouver, Calgary, Edmonton, Winnipeg, Windsor, London, Toronto, Ottawa, Montreal, Quebec City and Halifaxy. Coverage is significantly limited outside these areas. 3. Visit onstar.ca for coverage maps, details and system limitations. Services and connectivity may vary by model and conditions. OnStar with 4G LTE connectivity is available on select vehicle models and in select markets. Customers will be able to access OnStar services only if they accept the OnStar User Terms and Privacy Statement (including software terms). OnStar acts as a link to existing emergency service providers. After the trial period (if applicable), an active OnStar service plan is required. 4. Devices must be WPA2-compliant with active OnStar service and data plan. Wi-Fi devices manufactured prior to 2006 may not be compatible. Please consult your device manufacturer for information regarding the WPA2 security protocol and Wi-Fi device compatibility. Vehicle must be started or in accessory mode to access Wi-Fi. Visit onstar.ca for details and system limitations. 5. The system wirelessly charges one PMA- or Qi-compatible mobile device.

## EVEN THE SECOND AND THIRD ROWS ARE FIRST CLASS.





7 |



POWER-FOLDING THIRD-ROW SEATS All it takes is mere seconds for these seats to fold flat, letting you go from passenger space to cargo space and back in no time. HEATED SECOND-ROW SEATS Our outboard second-row seats make a great first impression, providing warmth, comfort and luxury in abundance. POWER-RELEASE FOLD-AND-TUMBLE SECOND-ROW SEATS In the Luxury, Premium and Platinum Collections, a simple touch of a button sends the second row in motion, making it infinitely more convenient for rear passengers to enter the spacious third row. SPACE FOR EVERYTHING With the third-row seats folded flat, the Escalade ESV offers 3,412 litres of cargo space<sup>1</sup> and more storage compartments than ever before. CARGO MANAGEMENT SYSTEM More storage means you can bring more of what matters to you. The system located behind the third row provides additional underfloor space. Simply lift the hinged door to find a compartment that's hidden from view yet easy to access. CENTRE CONSOLE STORAGE A smartphone deserves a smart console. That's why we created one with multiple USB<sup>2</sup> ports and a layered soft-touch tray. It has an intelligently designed section for your electronic devices and overall room to accommodate a tablet or small laptop. And because not all things run on USB, there's a 110-volt power outlet.





8





## SCIENCE AND ART PROUDLY DISPLAYED IN A SINGLE MUSEUM.

#### INTELLIBEAM HEADLAMPS

When oncoming headlamps are sensed or when tail lamps are detected in front of you, available IntelliBeam™ headlamps intuitively adjust between low and high beam. It's a perfect example of dim being bright.

#### ADVANCED FORWARD LIGHTING

There's brilliance behind the brilliance. Full LED headlamps – including industry-first Total Internal Reflectance LED high-beam technology – use less power while supplying greater performance and produce an exclusive and vibrant razor-like vertical light signature. In addition, cornering lamps on the Premium and Platinum Collections engage when sensors indicate the vehicle is turning, projecting light to the side of the vehicle to better illuminate the path you're travelling.

#### AERO GRILLE SHUTTERS

These grille shutters automatically close at highway speeds to maximize aerodynamics and open at lower speeds when additional engine cooling may be required.

#### POWER-RETRACTABLE ASSIST STEPS

An engraved invitation to enter Escalade. Powerretractable assist steps feature LED lighting that illuminates the surrounding area to ease vehicle entry and help you find solid footing. Available on the Premium and Platinum Collections.



#### 6.2L V8 ENGINE

The 6.2L V8, paired with a smooth-shifting 8-speed transmission, is the beast inside the beauty. When it's power you want, it's power you get, with 460 lb.-ft. of torque and 420 hp. And with advanced technology like Variable Valve Timing, Direct Injection and Active Fuel Management, our commanding power plant also achieves excellent fuel economy for a large luxury SUV!

#### ESCALADE PERFORMANCE

Selectable four-wheel drive — with a two-speed transfer case and neutral setting — only seems like a luxury until you need it. Include a standard Trailering Package and go from extravagance to essential. The Magnetic Ride Control™ suspension, with driver-selectable Touring and Sport modes, reads the road up to 1,000 times per second and adjusts the suspension to ever-changing road conditions.

#### SURROUND VISION

Your eyes in the sky. To help ensure you're seeing the area around your Escalade when backing up, a series of cameras work together to provide a birdseye view of the vehicle and the areas immediately surrounding it. This view, projected on the CUE screen, helps increase your awareness, and that helps everyone.

#### INVISIBLE REAR WIPER

This is what happens when artists and engineers design an SUV – you get a sleek and clean exterior. And a simple thing like a rear wiper is not going to get in the way of that. Instead of cutting into the beauty of Escalade, it is brilliantly concealed when not in use, clearing your rear vision while enhancing its bold aesthetics.

## HANDS-FREE POWER LIFTGATE WITH PROGRAMMABLE MEMORY HEIGHT

With the keyless access fob in your pocket or purse, this feature lets you simply place your foot under the rear bumper to both open and close the liftgate, delivering a truly hands-free experience. The memory height function lets you program how high the gate will open, which is important for those who have a garage with a low ceiling.

#### 22-INCH WHEELS

Available 22-inch wheels don't just turn heads.

They're crafted with a full-forming process to help save weight while creating a strong wheel. And the tires on Escalade have been engineered to balance incredible traction and optimal fuel economy!

#### LIGHT-BLADE LED TAIL LAMPS

Our best shine bright. Full LED tail lamps boast a clean, classic appearance, but that's far from the end of the story. These long-lasting lights also use less power and activate 200 milliseconds faster than an incandescent bulb, which could give the driver behind you extra time to react when it's most important.

EVERY ESCALADE MAKES A STATEMENT.

ESV JUST MAKES A BIGGER ONE.





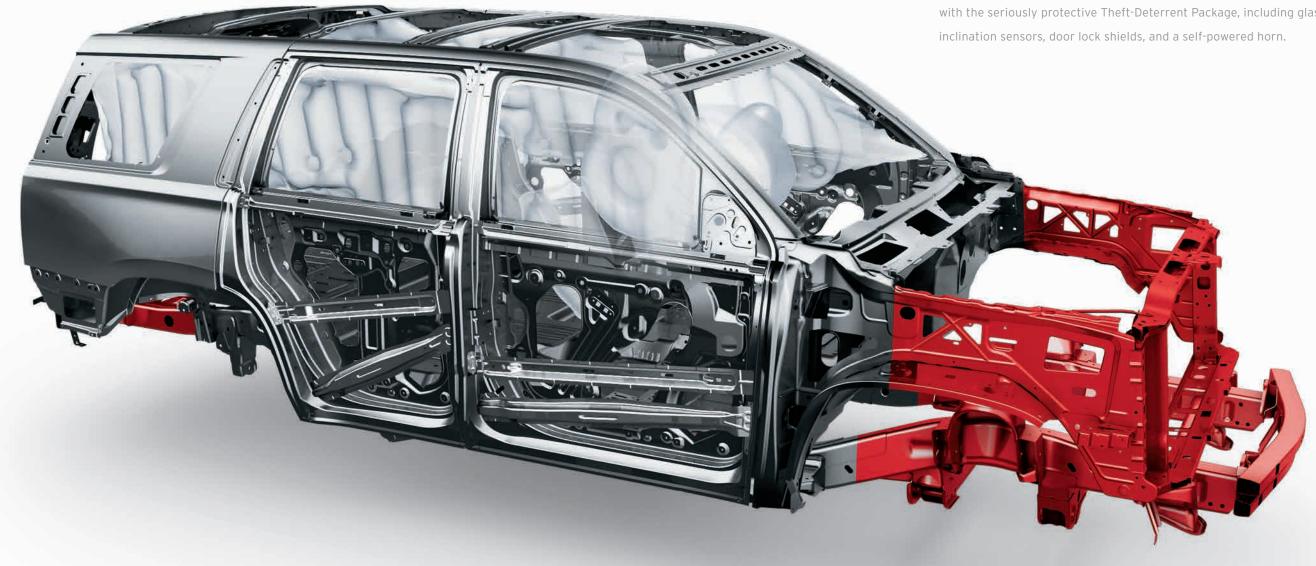
As with every aspect of this icon, the additional 518 millimetres of **ESCALADE ESV** aren't just for show. The extra room provides generous luxury for up to eight passengers – including 246 more millimetres of third-row legroom.

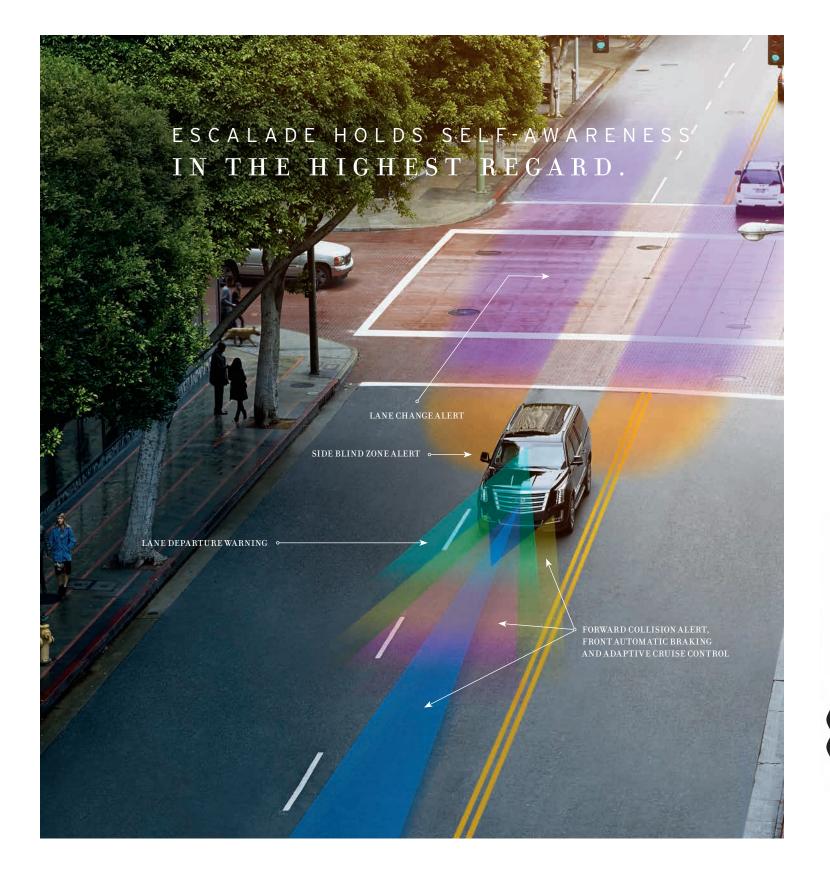
There's nearly 3,424 litres¹ of cargo capacity with all seats folded – that's 756 litres¹ more than the standard wheelbase Escalade – not to mention 1,113 litres¹ behind the third row. And the ESV was designed with larger rear doors that open wide to allow easy entry or exit, proving we'll go to great lengths to make sure you're fully accommodated.

## IN THIS CASE, "OVERPROTECTIVE" IS A COMPLIMENT.

using ultra-high-strength steel alloys. Safety is further enhanced with crumple zones (shown in red) designed to help protect you and your passengers when the unexpected happens. And since there's safety in numbers, the Escalade is equipped with seven strategically located airbags, including the Front Centre Airbag designed to help reduce the risk of injury to the driver and passenger in a side-impact situation. Vehicle protection is serious business. So we've equipped the Luxury, Premium and Platinum Collections with the seriously protective Theft-Deterrent Package, including glass breakage, interior motion and inclination sensors, door lock shields, and a self-powered horn.

Safety starts with a strong foundation. And every Escalade has one, including a safety cage constructed





The Luxury, Premium and Platinum Collections include a DRIVER AWARENESS

PACKAGE with a SAFETY ALERT SEAT that sends pulses through the seat cushion on the left or right or simultaneously, alerting you to a variety of potential hazards as well as the direction they're coming from; FORWARD COLLISION ALERT that uses a forward-facing front camera to detect and warn you when an impact may be imminent; and LANE DEPARTURE WARNING that monitors road lines and alerts you when the vehicle begins to drift into another lane without the use of a turn signal. A DRIVER ASSIST PACKAGE included on the Premium and Platinum Collections features ADAPTIVE

CRUISE CONTROL, which uses forward-looking radar and camera technology to naturally maintain a driver-selected following distance from the vehicle ahead, even in stop-and-go traffic. FRONT AND REAR AUTOMATIC BRAKING detects when a frontal or rear collision is imminent and automatically applies braking to lessen impact severity or perhaps avoid certain low-speed situations altogether. Also included in the Driver Assist Package is AUTOMATIC SAFETY BELT TIGHTENING to help keep your belt precisely



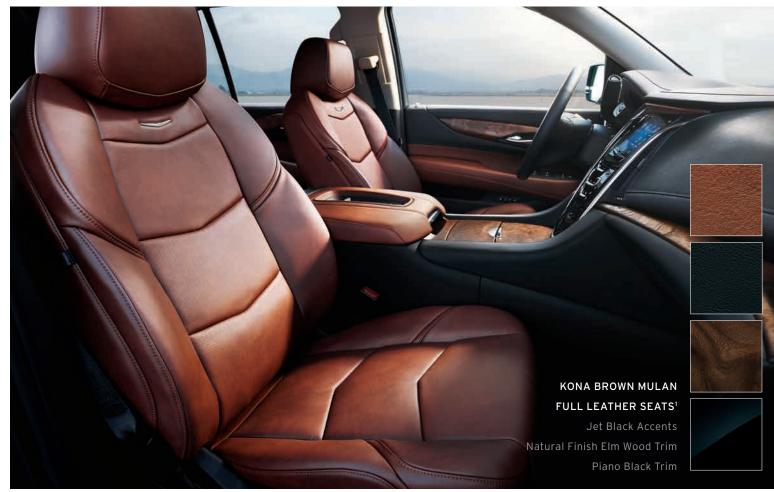
where it needs to be. Included on Luxury, Premium and Platinum

Collections are REAR CROSS TRAFFIC ALERT, which uses sensors to sweep the left and right areas to the sides of your Escalade when you back out of parking spots and alerts you to approaching vehicles;

SIDE BLIND ZONE ALERT, which alerts you with a sidemirror warning icon if a vehicle is in your blind spot before you merge or make a lane change; and LANE CHANGE ALERT, which surveys the areas well beyond the side blind zones and flashes the side-mirror warning icon to alert you of rapidly approaching vehicles.

Safety features are no substitute for the driver's responsibility to operate the vehicle in a safe manner. The driver should remain attentive to traffic, surroundings and road conditions at all times.

### INTERIOR THEMES





TUSCAN BROWN NAPPA SEMI-ANILINE FULL LEATHER SEATS<sup>2</sup>

Natural Finish Crème Laurel Wood Trim

Sueded Microfibre Headliner

Piano Black Trim



JET BLACK NAPPA SEMI-ANILINE FULL LEATHER SEATS<sup>2</sup>













JET BLACK MULAN LEATHER SEATING SURFACES

Jet Black Accents Santos Palisander Wood Trim Piano Black Trim



SHALE MULAN LEATHER SEATING SURFACES

Cocoa Accents American Walnut Wood Trim Piano Black Trim











### EXTERIOR COLOURS









WHITE DIAMOND TRICOAT1







TINTCOAT | A premium two-layer paint application with the addition of a tinted clearcoat, lending the finish an extra depth and brightness.

TRICOAT | A meticulous three-layer process that results in a dramatic hue-shifting colour.

## WHEELS



20" DUAL 7-SPOKE CHROME-PLATED WHEELS STANDARD ON ESCALADE AND ESCALADE ESV AND INCLUDES P275/55R20 ALL-SEASON TIRES<sup>3</sup>



22" 7-SPOKE PREMIUM PAINTED WHEELS WITH CHROME INSERTS STANDARD ON ESCALADE AND ESCALADE ESV LUXURY AND PREMIUM COLLECTIONS AND INCLUDES P285/45R22 ALL-SEASON TIRES<sup>3</sup>



22" DUAL 7-SPOKE PREMIUM PAINTED WHEELS WITH ULTRA BRIGHT MACHINED FINISH AVAILABLE ON ESCALADE AND ESCALADE ESV LUXURY AND PREMIUM COLLECTIONS AND INCLUDES P285/45R22 ALL-SEASON TIRES<sup>3</sup>



22" PREMIUM PAINTED WHEELS WITH CHROME INSERTS STANDARD ON ESCALADE AND ESCALADE ESV PLATINUM COLLECTION AND INCLUDES P285/45R22 ALL-SEASON TIRES<sup>3</sup>





## OWNER PRIVILEGES

We have created the most comprehensive suite of owner privileges offered by any luxury automotive brand in the world, providing everything our Cadillac owners need and everything they deserve.



#### PREMIUM CARE MAINTENANCE

The Cadillac Premium Care Maintenance program covers routine oil changes, tire rotations, certain air filter replacements and a thorough multipoint vehicle inspection for 4 years or 80,000 kilometres!



#### WARRANTY PROTECTION

The Cadillac 6-year or 110,000-kilometre<sup>1</sup> Powertrain Component Limited Warranty offers more years and kilometres standard than BMW, Mercedes-Benz and Audi. In addition, our 4-year or 80,000-kilometre<sup>1</sup> New Vehicle Limited Warranty covers most repairs on your vehicle, including parts and labour, to correct any concerns in materials or workmanship.



#### COURTESY TRANSPORTATION

This program provides alternative transportation and/or reimbursement of certain transportation expenses if your Cadillac requires warranty repairs for 6 years or 110,000 kilometres.1



#### ROADSIDE ASSISTANCE

Cadillac offers more years of standard Roadside Assistance than any leading luxury automaker, with services for 6 years or 110,000 kilometres<sup>1</sup> – the same years and kilometres you'll enjoy with our Powertrain Component Limited Warranty. This 24/7 program provides lock-out, towing and refuelling services and more.



The OnStar<sup>®2</sup> Directions & Connections Plan allows you to push one button to find the things and places you need. Get directions or a diagnostics check while you drive. Make calls with both hands on the wheel, and control your vehicle with the OnStar RemoteLink® mobile app.3 And, as always, get help immediately in a crash or an emergency. Escalade comes standard with one year of the OnStar Directions & Connections Plan.



#### EMERGENCY BY ONSTAR

With Automatic Crash Response,<sup>4</sup> in a crash, built-in sensors can automatically alert a specially trained OnStar Advisor who is immediately connected into your Cadillac to see if you need help sent to your exact location. Other OnStar emergency services include Injury Severity Prediction and First Assist, which ensure you quickly get the help you need when seconds matter most.



#### SECURITY BY ONSTAR

If you've reported your Cadillac stolen, OnStar can use GPS technology to help authorities quickly locate and recover it. An OnStar Advisor can further assist authorities by sending a remote signal to activate Stolen Vehicle Slowdown, <sup>®5</sup> which can gradually slow the vehicle to a stop to aid in its recovery. Advisors can also enable a Remote Ignition Block<sup>5</sup> making it impossible to restart a stolen vehicle once it has been turned off.



#### NAVIGATION BY ONSTAR

Just push the blue OnStar button, and an Advisor can download turn-by-turn directions6 to your Cadillac. A voice will then call out every turn, or the directions will be sent to your navigation system,



#### CONNECTIONS BY ONSTAR

Available OnStar Hands-Free Calling<sup>7</sup> allows you to make and receive calls safely from your Cadillac. With the OnStar RemoteLink mobile app, you can access real-time information and control your vehicle from anywhere you have cellphone service. With a few simple steps, you can find a destination using the RemoteLink app and send directions right to your vehicle.

Available OnStar 4G LTE<sup>8</sup> with Wi-Fi<sup>®</sup> can help you stay better connected to the world around you. The content and connections you crave throughout your day have moved inside your Cadillac with a hotspot capable of supporting up to seven compatible mobile devices9 at once, along with a reliable 4G LTE connection making it an easy way to access data on the go. You'll also see an enhancement to current OnStar services, including shorter response times and faster service delivery. This is the most powerful OnStar ever, empowering you and your passengers to create a highly connected world inside your car.



#### DIAGNOSTICS BY ONSTAR

With the most comprehensive vehicle diagnostics<sup>2</sup> from OnStar, maintaining your Cadillac can be as simple as checking your email or your OnStar RemoteLink mobile app. Every month, you can receive an email with the status of key operating systems, or push your blue OnStar button for a real-time diagnostics check on demand?



#### MYCADILLAC APP10







The ingenuity of the Escalade doesn't stop with the vehicle. As a Cadillac owner, an advanced app is available for your new car. From virtually anywhere at any time, a few taps of your finger on your iPhone® or Android™ smartphone let you access features such as parking reminders, Roadside Assistance and more. Plus, in conjunction with the OnStar RemoteLink app, you'll have the ability to remotely start your vehicle (when factory-equipped with remote start) and lock and unlock your doors from any place you have cell service. In addition, you can access key diagnostic information, including fuel tank level and range and remaining oil life.

1. Whichever comes first; fully transferable. 2. Visit onstanca for details and system limitations. OnStar acts as a link to existing emergency service providers. Services vary by model and conditions. After the complimentary period, an active OnStar service plan is required, 3. Available on select iOS, Android, BlackBerry and Windows devices. Requires an active OnStar service plan. Services vary by device, vehicle, conditions and the type of service plan you have. Please visit onstarca/mobile for vehicle availability system limitations and further details 4. OnStar acts as a link to existing emergency service providers. Not all vehicles can transmit all crash data. 5. Service varies by model and conditions. Visit onstar.ca for details and system limitations. Stolen Vehicle Slowdown and Remote Ignition Block are available on select 2009 and newer GM vehicles. 6. Requires ABS and Directions & Connections Plan. Visit onstar.ca for coverage map. Services vary by model. 7. OnStar Hands-Free Calling requires an existing OnStar service plan and prepaid minutes. Not available in certain markets. Calls may be made to the U.S. and Canada only. 8. Visit onstar.ca for coverage maps, details and system limitations. Services and connectivity may vary by model and conditions. OnStar with 4G LTE connectivity is available on select vehicle models and in select markets. Customers will be able to access OnStar services only if they accept the OnStar User Terms and Privacy Statement (including software terms). OnStar acts as a link to existing emergency service providers. After the trial period (if applicable), an active OnStar service plan is required. 9. Devices must be WPA2-compliant with active OnStar service and data plan. Wi-Fi devices manufactured prior to 2006 may not be compatible. Please consult your device manufacturer for information regarding the WPA2 security protocol and Wi-Fi device compatibility. Vehicle must be started or in accessory mode to access Wi-Fi. Visit onstar.ca for system details and limitations. 10. Requires iPhone or Android mobile device. 11. Subject to eligibility. 12. Conditions and limitations apply. 13. Program subject to change.

#### ACQUISITION OPTIONS

In addition to the many exclusive privileges of Cadillac ownership, General Motors of Canada has created a range of supplementary support programs to enhance your ownership experience. Some of these programs assist you in purchasing the Cadillac of your choice. Others help protect you and your new Cadillac over the long term.

#### PURCHASING OR LEASING

- GM Student Bonus Program Students or recent graduates of high school, college or university" may be entitled to receive a Student Bonus Vehicle Redemption Allowance of \$500 or \$75012 (tax inclusive: purchased vehicle dependent) to use toward the purchase. lease or finance of one eligible new Cadillac vehicle.
- Purchase Financing or Leasing On-the-spot financing at your GM dealership!
- The GM Card GM cardholders may redeem up to \$3,500 GM Card® Earnings (subject to Vehicle Redemption Allowances) toward the Total Purchase Price on eligible new GM vehicles.<sup>13</sup> For full program details, please visit theamcard.ca.

#### ADDITIONAL OWNERSHIP PROGRAMS

• Cadillac Owner Centre - As an owner, take advantage of the Cadillac Owner Centre. The online owner's destination gives you access to contests, current offers and the latest driving and maintenance tips. Find out more at cadillacowner.ca.

• GM Protection Plan (GMPP) – The only extended service plan backed by the resources and commitment of General Motors. GMPP may be purchased at the time of sale or subsequently during the New Vehicle Limited Warranty period.12

#### INFORMATION RESOURCES

You can obtain more information about Cadillac vehicles and programs from your Cadillac dealer or at these information centres:

- The Cadillac website at cadillac.ca.
- The Cadillac Contact Centre at 1-888-446-2000 (1-800-263-3830 for TDD users).

#### A WORD ABOUT THIS BROCHURE

Some of the equipment shown or described throughout this brochure may be available at extra cost. We have tried to make this brochure comprehensive and factual. We reserve the right, however, to make changes at any time, without notice, in prices, colours, materials, equipment, specifications, models and availability. Specifications, dimensions, measurements, ratings and other numbers in this brochure and other printed materials provided at the dealership or affixed to vehicles are approximates based upon design and engineering drawings and prototypes and laboratory tests. Your vehicle may differ due to variations in manufacture and equipment. Since some information may have been adapted since the time of printing, please check with your Cadillac dealer for complete details. General Motors of Canada Limited reserves the right to lengthen or shorten the model year for a product, for any reason, or to start and end model years at different times.

#### A WORD ABOUT ASSEMBLY

Cadillac vehicles are equipped with engines and components produced and assembled by different operating units of General Motors, its subsidiaries and suppliers, and these engines and components may change or be obtained from different sources from time to time. All such engines and components are approved for use in Cadillac vehicles. Certain equipment ordered may be unavailable at the time of assembly, and we suggest that you verify that your vehicle includes the equipment you ordered, or if there are changes, that they are

#### A WORD ABOUT CORROSION

Cadillacs are designed and built to resist corrosion. All body sheet-metal components are warranted against rust-through corrosion for 6 years. There is no deductible for rust-through repairs. Application of additional rust-inhibiting materials is not required under the corrosion coverage and none is recommended.

#### TRADEMARKS

The marks appearing in the Cadillac brochure including, but not limited to, General Motors, GM, Cadillac, the Cadillac Crest, and respective logos, emblems, slogans and vehicle model names and body designs; and other marks such as Cadillac User Experience, IntelliBeam and StabiliTrak are trademarks of General Motors and/or General Motors of Canada Limited. its subsidiaries, affiliates or licensors, OnStar the OnStar emblem and OnStar Remotel ink are registered trademarks of OnStar, LLC. Bose is a registered trademark of the Bose Corporation. App Store is a service mark of Apple, Inc. Apple and iPhone are registered trademarks of Apple, Inc., registered in the U.S. and other countries. Android is a trademark of Google Inc. BlackBerry is a registered trademark of Research In Motion, Limited. Windows is a registered trademark of Microsoft, Inc. Bluetooth is a registered trademark of Bluetooth SIG Inc. Google Play is a trademark of Google Inc. SiriusXM, the SiriusXM logo, channel names and logos are trademarks of Sirius XM Radio Inc. Wi-Fi is a registered trademark of Wi-Fi Alliance.® Brembo is a registered trademark of Brembo S.p.A.

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23 24 **EXHIBIT B** 

#### ESCALADE/ESCALADE ESV FEATURES & OPTIONS

	STANDARD	LUXURY	PREMIUM	PLATINU
DRIVETRAIN				
6.2L VVT, SIDI V8 ENGINE With Active Fuel Management®: 420 hp @ 5600 rpm and 460 lbft. of torque @ 4100 rpm;	C+-I	Ct-I	Ct-l	Ct-I
includes external oil cooler	Std Std	Std Std	Std Std	Std Std
FOUR-WHEEL DRIVE Driver-selectable two-speed transfer case: Automatic, 4WD High, 4WD Low and Neutral  TRANSMISSION, HYDRA-MATIC® 8L90 HEAVY-DUTY EIGHT-SPEED AUTOMATIC Includes Driver Shift Control manual mode,	Stu	Stu	Stu	Stu
Transmission, https://www.net.com/color/feight-speed actomatic includes briver shift control handar mode, Tow/Haul mode and external oil cooler	Std	Std	Std	Std
DIFFERENTIAL, HEAVY-DUTY LOCKING REAR	Std	Std	Std	Std
ENGINE BLOCK HEATER	Opt	Opt	Opt	Opt
CHASSIS AND SUSPENSION	,		,	
BRAKES				
Four-wheel vented disc with anti-lock system and Duralife™ rotors	Std	Std	Std	Std
Front and Rear Automatic Braking			Std	Std
Electric parking brake			Std	Std
Hill Hold and Hill Start Assist	Std	Std	Std	Std
STEERING, RACK-AND-PINION With variable electric power assist	Std	Std	Std	Std
SUSPENSION				
Independent front with coil-over-shock design/five-link rear	Std	Std	Std	Std
Automatic load levelling, rear	Std	Std	Std	Std
Magnetic Ride Control™ with selectable Sport mode	Std	Std	Std	Std
TRAILERING EQUIPMENT, HEAVY-DUTY	Std	Std	Std	Std
EXTERIOR				
AERO GRILLE SHUTTERS	Std	Std	Std	Std
ASSIST STEPS				
Integrated	Std	Std	Std	Std
Power-retractable with LED ground illumination			Opt	Opt
CAPLESS FUELLING SYSTEM	Std	Std	Std	Std
GLASS				
Acoustic windshield and front side	Std	Std	Std	Std
Rear privacy tint	Std	Std	Std	Std
Solar-absorbing windshield	Std	Std	Std	Std
KEYLESS ACCESS Passive entry for all exterior doors and rear liftgate	Std	Std	Std	Std
LIFTGATE, HANDS-FREE POWER With programmable memory height	Std	Std	Std	Std
LIGHTING				
Full LED headlamps, high and low beams, Cadillac signature daytime running lamps (DRL)	Std	Std	Std	Std
Full LED Light Blade tail lamps	Std	Std	Std	Std
Front cornering lamps, LED			Std	Std
IntelliBeam™ automatic high-beam On/Off		Std	Std	Std
Illuminating door handles			Std	Std
MIRRORS, REAR-VIEW Heated, power-adjustable, power-folding, curb view assistance, turn signal indicators, puddle lamps				
and driver-side automatic dimming	Std	Std	Std	Std
WHEELS See page 22 for descriptions and availability				
WIPERS				
Rainsense™ front	Std	Std	Std	Std
Rear integrated, intermittent with washer	Std	Std	Std	Std
INTERIOR				
ADAPTIVE REMOTE START	Std	Std	Std	Std
ADJUSTABLE PEDALS, POWER WITH MEMORY	Std	Std	Std	Std
AUDIO SYSTEM				
Premium 16-speaker Bose® Centerpoint® Surround Sound system	Std	Std	Std	Std
Three USB' ports, SD card reader and auxiliary audio connectivity	Std	Std	Std	Std
CD/MP3 single-disc player	Std	Std		
SiriusXM <sup>2</sup> with three trial months	Std	Std	Std	Std
BLUETOOTH® Hands-free calling and data-service streaming with Enhanced Voice Recognition	Std	Std	Std	Std
BOSE ACTIVE NOISE CANCELLATION	Std	Std	Std	Std
CENTRE CONSOLE				
Dual cupholders with cover	Std	Std	Std	Std
Wireless charging <sup>3</sup> for mobile devices	Std	Std	Std	Std
Insulated cooler with auxiliary power outlet and two USB¹ ports				Std
A Property of the Control of the Con	Std	Std	Std	
Covered storage with auxiliary power outlet and two USB¹ ports				Std
Covered storage with auxiliary power outlet and two USB¹ ports  110-volt power outlet and auxiliary power outlet for second-row passengers		Std	Sta	2111
110-volt power outlet and auxiliary power outlet for second-row passengers	Std	Std Std	Std Std	
110-volt power outlet and auxiliary power outlet for second-row passengers  CLIMATE CONTROL, TRI-ZONE AUTOMATIC With individual settings for driver, front passenger and rear seating areas		Std Std	Std	Std
110-volt power outlet and auxiliary power outlet for second-row passengers	Std			

/04/16 Page 27 of 28 PageID #: 62	STANDARD	LUXURY	PREMIUM	PLATINUM
INTERIOR (continued)				
CADILLAC USER EXPERIENCE® (CUE) <sup>5</sup>				
Information and media control system	Std	Std	Std	Std
8" diagonal colour touch screen	Std	Std	Std	Std
GAUGE CLUSTER, RECONFIGURABLE 12" Driver Information Centre with four themes: Simple, Enhanced, Balanced or Performance	Std	Std	Std	Std
KEYLESS ACCESS WITH PUSH-BUTTON START	Std	Std	Std	Std
LED illumination of the interior, door handle releases, door storage, console and footwell areas	Std	Std	Std	Std
Theatre dimming	Std	Std	Std	Std
MEMORY PACKAGE Includes two presets for driver-seat position, exterior rear-view mirrors, power tilt/telescoping steering	Jiu	Jtu	Jiu	Jtu
column and power-adjustable pedals	Std	Std	Std	Std
MIRROR Automatic dimming rear-view, with OnStar®6 controls	Std	Std	Std	Std
NAVIGATION <sup>7</sup> Integrated with CUE; includes voice and text guidance	Std	Std	Std	Std
ONSTAR 4G LTE WITH WI-FI® HOTSPOT CAPABILITY8 Includes a three-month or three-gigabyte-data trial, whichever comes first	Std	Std	Std	Std
REAR-SEAT ENTERTAINMENT SYSTEM, BLU-RAY™-CAPABLE Includes 9" diagonal full-colour fold-down screen; remote control; 2 two-channel wireless headphones; auxiliary audio/video jacks located on the rear of the centre console; and LED-backlit display		Opt	Std	Std
Two 7" diagonal full-colour screens in front head restraints				Std
Third-row 9" diagonal full-colour fold-down screen (Escalade ESV only)		Opt	Std	Std
SEATING		Орг		
Leather seating surfaces (Mulan first- and second-row)	Std	Std	Std	
Full leather seats (Nappa semi-aniline first- and second-row; Mulan third-row)				Std
Front bucket, 12-way power adjustment including 4-way power lumbar control	Std	Std	Std	
Front bucket, 18-way power adjustment including 4-way power lumbar control				Std
Heated and cooled driver and front passenger with three settings	Std	Std	Std	Std
Heated outboard second-row seats with three settings	Std	Std	Std	Std
Massaging driver seat with rolling, kneading and anti-fatigue modes				Std
Second-row bucket, manual fold-and-tumble	Std			
Second-row bucket, power-release fold-and-tumble		Std	Std	Std
Second-row, 60/40 split-bench, manual fold-and-tumble	Opt			
Second-row, 60/40 split-bench, power-release fold-and-tumble		Opt	Opt	Opt
Third-row 60/40 split-bench, power fold-flat, up and down	Std	Std	Std	Std
STEERING COLUMN, POWER TILT/TELESCOPING	Std	Std	Std	Std
STEERING WHEEL Heated, leather-wrapped with fingertip controls for CUE, audio, Bluetooth phone interface and cruise control	Std	Std	Std	Std
SUNROOF Power tilt-sliding with express-open/-close and sunshade		Std	Std	Std
TIRE PRESSURE MONITORING SYSTEM Excludes spare tire	Std	Std	Std	Std
UNIVERSAL HOME REMOTE Three-channel	Std	Std	Std	Std
WINDOWS, POWER With driver and front-passenger express-up/-down and rear passenger express-down	Std	Std	Std	Std
SAFETY AND SECURITY				
AIRBAGS° Driver and front-passenger dual-stage frontal; driver seat-mounted Front Centre Airbag; driver and front-passenger seat-mounted side-impact for thorax and pelvic protection; and head-curtain side-impact for outboard seating positions, with rollover sensor DRIVER AWARENESS PACKAGE	Std	Std	Std	Std
Forward Collision Alert		Std	Std	Std
Lane Departure Warning		Std	Std	Std
Safety Alert Seat		Std	Std	Std
DRIVER ASSIST PACKAGE Adaptive Cruise Control with full-speed range <sup>4</sup>			Std	Std
Automatic Collision Preparation			Std	Std
Front and Rear Automatic Braking			Std	Std
Automatic Safety Belt Tightening		61.1	Std	Std
HEAD-UP DISPLAY Full-colour, reconfigurable		Std	Std	Std
LANE CHANGE ALERT  ONSTARS Operations & Connections Plan	C+4	Std	Std	Std
ONSTAR® One-year Directions & Connections Plan  PARK ASSIST, FRONT AND REAR	Std Std	Std Std	Std Std	Std Std
REAR CROSS TRAFFIC ALERT	Stu	Std	Std	Std
SIDE BLIND ZONE ALERT <sup>10</sup>		Std	Std	Std
STABILITRAK® ELECTRONIC STABILITY CONTROL WITH ROLLOVER MITIGATION	Std	Std	Std	Std
SURROUND VISION Birdseye view of vehicle	Std	Std	Std	Std
THEFT-DETERRENT PACKAGE Content theft alarm with vehicle inclination sensors, interior motion sensor, glass breakage sensors	Jiu	Stu	Siu	JiU
in rear quarter glass and liftgate window, and self-powered horn		Std	Std	Std
THEFT-DETERRENT SYSTEM Engine immobilizer and electronic immobilizer	Std	Std	Std	Std
TRACTION CONTROL All-speed with brake and engine intervention	Std	Std	Std	Std

1. Not compatible with all devices. 2. Available in 10 Canadian provinces, 3 territories and the 48 contiguous United States. Basic monthly subscription required and sold separately after trial period. All fees and programming are subject to change. Subscription subject to customer agreement at siriusxm.ca/terms. 3. The system wirelessly charges one PMA- or Oi-compatible mobile device. 4. Adaptive Cruise Control is no substitute for the driver's personal responsibility to operate the vehicle in a safe manner. The driver needs to remain attentive to traffic and road conditions and provide the steering, braking or other inputs necessary to retain control of the vehicle. The Front Automatic Braking feature may help reduce crash damage under certain conditions discussed in the Owner's Manual. Never rely on this feature to brake the vehicle. 5. CUE functionality varies by model. Full functionality requires compatible Bluetooth and smartphone, and USB connectivity for some devices. Visit CUE.Cadillac.ca for more details. 6. Visit onstar.ca for coverage maps, details and system limitations. Services and connectivity may vary by model and conditions. OnStar with 4G LTE connectivity is available on select vehicle models and in select markets. Customers will be able to access OnStar services only if they accept the OnStar User Terms and Privacy Statement (including software terms). OnStar acts as a link to existing emergency service providers. After the trial period (if applicable), an active OnStar service plan is required. 7. At time of printing, detailed map coverage is available for most major urban areas of the United States and for certain metropolitan areas of Canada (Vancouver, Calgary, Edmonton, Winnipeg, Windsor, London, Toronto, Ottawa, Montreal, Quebec City and Halifax). Coverage is significantly limited outside these areas. 8. Devices must be WPA2-compliant with active OnStar service and data plan. Wi-Fi devices manufactured prior to 2006 may not be complatible. Please consult your device manufacturer for in





**EXHIBIT B**