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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

*In re ZF-TRW Airbag Control Units  
Products Liability Litigation*

ALL CASES AGAINST THE  
HYUNDAI-KIA DEFENDANTS

Case No. 2:19-ml-02905-JAK-JPR  
MDL 2905 JAK

**DECLARATION OF JENNIFER  
M. KEOUGH ON SETTLEMENT  
NOTICE PROGRAM PROGRESS**

The Honorable John A. Kronstadt

1 I, Jennifer Keough, hereby declare and state as follows:

2 1. I am the Chief Executive Officer and Co-Founder of JND Legal  
3 Administration LLC (“JND”). I oversee all facets of our company’s operations,  
4 including monitoring and implementing our notice and claims administration  
5 programs. This Declaration is based on my personal knowledge as well as upon  
6 information provided to me by experienced JND employees, and if called upon to  
7 do so, I could and would testify competently thereto.

8 2. This Declaration describes the implementation of the Notice Program,<sup>1</sup>  
9 as outlined in my March 17, 2025, Declaration on Settlement Notice Program (ECF  
10 1027-2, the “Initial Declaration”), and provides an update on the notice  
11 administration process. The Notice Program is ongoing and was designed to reach  
12 virtually all potential Class Members to inform them of the proposed Settlement  
13 and their rights and options.

14 **CAFA NOTICE**

15 3. On March 27, 2025, JND mailed notice of the Hyundai-Kia Airbag  
16 Control Unit Settlement to the United States Attorney General and to the  
17 appropriate State officials pursuant to the Class Action Fairness Act of 2005.

18 **DIRECT NOTICE**

19 **A. Class Member Identification**

20 4. To prepare direct notice to Class Members, JND obtained the Vehicle  
21 Identification Numbers (VINs) for each of the Hyundai and Kia Subject Vehicles.  
22 Defendants provided JND with data that identified 3,729,557 unique Hyundai and  
23 Kia Subject Vehicle VINs. This includes 2,205,757 Hyundai Subject Vehicle VINs,  
24 of which 583,384 are Recalled Vehicles and 1,523,800 Kia Subject Vehicles VINs,  
25 of which 507,587 are Recalled Vehicles.

26  
27  
28 <sup>1</sup> All capitalized terms not defined herein have the meanings given to them in my Initial Declaration.

1           5.     Using the Hyundai and Kia Subject Vehicle VIN data, JND staff  
2 worked with a third-party data aggregation service to acquire vehicle registration  
3 information from the state Departments of Motor Vehicles (“DMVs”) for all fifty  
4 states and U.S. Territories. This data included the contact information for all current  
5 and former owners and lessees of the Hyundai and Kia Subject Vehicles.

6           6.     JND combined, analyzed, de-duplicated and standardized the data that  
7 it received from the DMVs to provide individual notice to virtually all potential  
8 Class Members.

9           7.     JND promptly loaded the VINs and potential Class Member contact  
10 information into a case-specific database for the Settlement. A unique identification  
11 number was assigned to each potential Class Member to identify them throughout  
12 the administration process.

13           8.     JND conducted a sophisticated email append process to obtain email  
14 addresses for as many potential Class Members as possible. The email append  
15 process utilized skip tracing tools to identify any email address by which the  
16 potential Class Member may be reached. JND then reviewed the data to identify  
17 any undeliverable email addresses.

18           **B.     Direct Email Notice**

19           9.     The direct email notice campaign commenced on June 6, 2025. JND  
20 emailed notice to all potential Class Members for whom JND obtained a valid  
21 email address through the email append process. The Email Notice included the  
22 same language as the court-approved Email Notice (ECF 1027-2, Exhibit B). JND  
23 customized the Email Notice to include the potential Class Member’s name and  
24 VIN. The Email Notice contained links to the Settlement Website and directed the  
25 potential Class Member to visit the website to get more information and submit  
26 their Settlement claim.

27           10.    JND sent a total of 6,070,187 Email Notices, of which 642,216  
28 bounced back and were not deliverable. Based on JND’s experience in other cases,

1 this non-deliverable rate of 10.58% is typical. As described below, JND will  
2 supplement the direct email notice campaign by sending Postcard Notices to the  
3 Class Members for whom we did not obtain a valid email address or whose Email  
4 Notices bounced back as undeliverable.

5 11. The Email Notice as sent is attached as **Exhibit A**.

6 **C. Direct Mail Notice**

7 12. The direct mail notice campaign will commence on July 16, 2025 and  
8 be complete by July 21, 2025. A Postcard Notice is being sent to all potential Class  
9 Members for whom an Email Notice bounced back as undeliverable, or for whom a  
10 valid email address was not obtained. The Postcard Notice includes the same  
11 language as the court-approved Postcard Notice (ECF, 1027-2, Exhibit C). JND  
12 will customize the Postcard Notice to include the potential Class Member's name,  
13 address, and VIN. The Postcard Notice will provide the Settlement Website URL  
14 and a QR code that directly links to the Settlement Website. Potential Class  
15 Members will be directed to visit the Settlement Website to get more information  
16 and submit their Settlement claim.

17 13. JND will send a total of 3,086,639 Postcard Notices. JND will research  
18 and promptly re-mail the Notice to any verified updated address that is obtained.

19 14. The Postcard Notice is attached as **Exhibit B**.

20 15. For any potential Class Members who have more than 10 VINs  
21 associated with their name and address, JND will send a cover letter that includes  
22 language from the Postcard Notice to advise them of the process to submit a bulk  
23 claim for more than 10 Hyundai and Kia Subject Vehicles.

24 16. The cover letter is attached as **Exhibit C**.

**SUPPLEMENTAL DIGITAL NOTICE**

**A. Digital Campaign**

17. As detailed in the Initial Declaration, JND is supplementing the direct notice effort with a four-week digital campaign that is running through the Google Display Network (“GDN”), Facebook, and Instagram.

18. Prior to launching the digital effort, JND provided GDN, Facebook, and Instagram with secured data to identify potential Class Members based on phone numbers, postal addresses, and/or emails. GDN then matched this Class data with its own first-party data which it collect through Gmail, YouTube, Chrome registrations, etc. Likewise, Facebook and Instagram matched the provided data with its account user data. All matches were utilized to create a “Custom Audience” list. Ads are then served to the Custom Audience while they are active on GDN, Facebook, and Instagram over the course of the campaign. The Class Member data is not being used by GDN, Facebook, or Instagram for any purpose other than the customer match campaign.

19. In addition to the Custom Audience effort, GDN activity is also targeting adults in the U.S. and its territories or possessions who have an interest in Hyundai and Kia vehicles, Hyundai Motor America, Kia America, Inc., and the Hyundai Sonata, the Hyundai Kona, the Hyundai Veloster, the Kia Forte, the Kia Optima, and the Kia Sedona; as well as users who have recently searched Google for relevant keywords such as Kia Sedona recall, Hyundai Sonata recall, Hyundai Sonata hybrid, Hyundai Sonata, Kia Sedona, Kia Optima hybrid, Kia Optima recall, Hyundai recall, Kia recall, Kia Forte, Kia Forte Coup, Hyundai airbag, and Kia airbag.

20. Likewise, Facebook and Instagram activity is also targeting adults in the U.S. and its territories or possessions who have an interest in Hyundai and Kia vehicles, Hyundai Motor America, Kia America, Inc., the Hyundai Sonata, the Hyundai Veloster, the Kia Forte, and the Kia Optima.

1           21. The digital ads include an embedded link to the Settlement Website,  
2 where potential Class Members can get more information about the Settlement and  
3 file a claim online. A total of 18,751,458 digital impressions were served from June  
4 25, 2025 through July 14, 2025.<sup>2</sup> The digital effort is scheduled to end July 22,  
5 2025 with a total of 21 million impressions being served.

6           22. Screenshots of the digital notices as they appeared on GDN, Facebook,  
7 and Instagram are attached as **Exhibit D**.

8           **B. Internet Search Campaign**

9           23. From June 25, 2025 through July 14, 2025, JND caused 11,408  
10 additional impressions to be served through an internet search campaign. The  
11 search effort is scheduled to end July 22, 2025.

12           24. When purchased keywords/phrases related to the Settlement (e.g.,  
13 content on the Settlement Website landing page) are searched, a paid Responsive  
14 Search Ad (“RSA”) with a hyperlink to the Settlement Website may sometimes  
15 appear on the search engine results page. When the RSA is clicked, the visitor is  
16 redirected to the Settlement Website where they can get more information about the  
17 Settlement. The search effort is being monitored and optimized for  
18 keywords/phrases that result in the best click-throughs/conversions.

19           25. Screenshots of the RSAs as they appeared online are attached as  
20 **Exhibit E**.

21           **C. Press Release**

22           26. JND caused a press release to be distributed on June 25, 2025 to over  
23 5,000 media outlets throughout the U.S., Guam, Full Latin America (to reach  
24 Puerto Rico), US Virgin Islands, and Pacific Islands (to reach other  
25  
26

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27 <sup>2</sup> Impressions or Exposures are the total number of opportunities to be exposed to a media vehicle or  
28 combination of media vehicles containing a notice. Impressions are a gross or cumulative number that  
may include the same person more than once. As a result, impressions can and often do exceed the  
population size.

1 territories/possessions). As of July 10, 2025, the press release was picked up 521  
2 times with a potential audience of 64.2 million.

3 27. A copy of the press release as distributed is attached as **Exhibit F.**

4 **SETTLEMENT WEBSITE AND OTHER CLASS MEMBER NOTICE**

5 **A. Settlement Website**

6 28. On April 21, 2025, JND launched an interactive, case-specific  
7 Settlement Website at [www.ACUSettlement.com/hyundaikia](http://www.ACUSettlement.com/hyundaikia). This site is located at  
8 a subdomain of the ACU Settlements Website, which also provides information  
9 about other related settlements. The Settlement Website was listed in the email and  
10 digital notices, and is listed in and accessible through QR code in the Postcard  
11 Notice. The Settlement Website provides comprehensive information about the  
12 Settlement, including answers to frequently asked questions (“FAQs”), contact  
13 information for the Settlement Notice Administrator, key dates, including the  
14 deadlines to file a claim, request exclusion, and object, and links to important case  
15 documents, including the Long Form Notice, the Claim Form, and the Settlement  
16 Agreement.

17 29. In addition, the Settlement Website provides a VIN Lookup feature,  
18 where potential Class Members can input their VIN to determine whether their  
19 vehicle may be eligible for compensation under the Settlement Agreement.

20 30. The Settlement Website also features an online Claim Form with  
21 document upload capabilities for the submission of claims. Additionally, as noted  
22 above, a Claim Form is posted on the Settlement Website for download for those  
23 Class Members who prefer to submit a Claim Form by mail.

24 31. As of July 14, 2025, the Settlement Website has tracked a total of  
25 62,720 unique users who registered 74,549 sessions. JND will continue to update  
26 and maintain the Settlement Website throughout the Settlement administration  
27 process.  
28

1           **B. Settlement Notice Administrator Email Address**

2           32. JND has established a dedicated email address,  
3 HKinfo@ACUSettlement.com, to receive and respond to potential Class Member  
4 inquiries. As of July 14, 2025 the dedicated email address has received 259 emails.

5           **C. Settlement Notice Administrator Toll-Free Number**

6           33. JND maintains a 24-hour, toll-free telephone line, 1-866-287-0740,  
7 that potential Class Members can call to obtain information about the Settlement.  
8 During business hours, JND's call center is staffed with operators who are trained  
9 to answer questions about the Settlement. As of July 14, 2025, the toll-free  
10 telephone line has received 449 calls.

11           **D. Settlement Notice Administrator Post Office Box**

12           34. JND has established a dedicated post office box to receive Class  
13 Member correspondence, paper Claim Forms, and exclusion requests.

14                           **CLAIMS RECEIVED**

15           35. Class Members may file a claim online through the Settlement  
16 Website or via postal mail. Class Members who do not wish to submit their claim  
17 online may download and print a Claim Form through the Settlement Website or  
18 request a mailed copy of a Claim Form by contacting the Settlement Notice  
19 Administrator.

20           36. As of July 14, 2025, JND has received 13,728 Claims, of which 13,719  
21 were submitted electronically online and 9 were submitted via mail.

22           37. JND continues to receive and process Claim Form submissions and  
23 will continue to report to Counsel on the status of the claim intake and review. The  
24 claim filing deadline for Class Members is anticipated as March 29, 2027, but it is  
25 subject to change depending on when the Settlement receives final approval.



**OBJECTIONS**

38. The Email Notice, Postcard Notice and Long Form Notice (collectively, the “Notices”) inform recipients that any Class Member who wants to object to the proposed Settlement could do so by submitting a written statement on or before August 25, 2025. As of July 14, 2025, JND has received or is otherwise aware of zero objections.

**REQUESTS FOR EXCLUSION**

39. The Notices also inform Class Members of their right to opt out of the Settlement and the August 25, 2025 postmark deadline to do so. As of July 14, 2025, JND has received or is otherwise aware of one request for exclusion. No later than 10 days before the date of the Fairness Hearing, JND will prepare and provide to Counsel a list of individuals and entities who have excluded themselves from the Settlement.

**NOTICE DESIGN AND CONTENT**

40. The Notices were designed to comply with Rule 23’s guidelines for class action notices and the FJC’s *Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide*. The Notices contained easy-to-read summaries of the instructions on how to obtain more information about the case and direct potential Class Members to the Settlement Website, where the Long Form Notice and other case documents are posted. Courts routinely approve notices that have been written and designed in a similar manner.

**TOTAL COST OF ADMINISTRATION**

41. The total cost of the notice and claims administration program will ultimately depend on the final claims rate, but JND projects that the total costs will range from approximately \$5.3 million to \$7.2 million based on typical settlement participation rates of 5%-10%.

**CONCLUSION**

42. In my opinion, the Notice Program is proving successful and providing the best notice practicable under the circumstances of this case. I will provide a supplemental declaration to the Court prior to the Final Approval Hearing to provide updated information regarding the implementation of the Notice Program.

I declare under penalty of perjury that the foregoing is true and correct.

Executed July 15, 2025, at Seattle, Washington.

By: Jennifer M. Keough  
Jennifer M. Keough

# EXHIBIT A

From: [HKinfo@ACUSettlement.com](mailto:HKinfo@ACUSettlement.com)

To: [Class Member email address]

Subject: Hyundai-Kia Airbag Control Unit Settlement Notice

**COURT-APPROVED LEGAL NOTICE**

This is an official, Court-approved Notice about a class action settlement.

Please review the important information below.

**Questions?**

Visit [www.ACUSettlement.com](http://www.ACUSettlement.com)  
or Call 1-866-287-0740

**Hyundai-Kia Airbag Control Unit Settlement**

c/o JND Legal Administration  
PO Box 91478  
Seattle, WA 98111

**HYUNDAI-KIA AIRBAG CONTROL UNIT CLASS ACTION SETTLEMENT NOTICE**

**Cash Payments of up to \$350 and Other Benefits are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles.**

**PLEASE REFER TO YOUR UNIQUE ID AND PIN TO FILE A CLAIM**

YOUR VIN:	YOUR UNIQUE ID:	YOUR PIN:
XXXXXXXXXXXXXXXXXX	<<Unique_ID>>	XXXXXXXX

Dear [Class Member Name],

You are receiving this Notice because you may be a Class Member in a proposed class action settlement in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). A list of the Hyundai and Kia Class Vehicles and other important information and case documents are available on the Settlement Website, [www.ACUSettlement.com](http://www.ACUSettlement.com).

Class Members include all persons or entities who or which, on or before **April 14, 2025**, own, lease, or previously owned or leased Hyundai and Kia Class Vehicles distributed for sale or lease in the United States or any of its territories or possessions. Eligibility for cash payments will be determined by VIN. The Hyundai and Kia Class Vehicles are the:

- 2011-2019 Hyundai Sonata;
- 2011-2019 Hyundai Sonata Hybrid;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;

- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima Hybrid; and
- 2011-2012, 2014 Kia Sedona;

The Settlement provides **\$62.1 million** to resolve claims that the Hyundai and Kia Class Vehicles contain defective ZF-TRW airbag control units that are vulnerable to a condition called electrical overstress, which may cause the vehicles' airbags and other safety features to fail during a collision. The Settling defendants deny the claims but have agreed to settle. The Court has not decided who is right.

You have been identified as a potential Class Member based on records from Hyundai and Kia and the DMV. The purpose of this Notice is to inform you of the proposed class action settlement so you may decide what to do. **Your legal rights under the Settlement are affected even if you do nothing, so please read this Notice carefully.**

**The cash compensation available will be reimbursement for certain out-of-pocket expenses related to the Recalls and residual payments of up to \$350 for Recalled Vehicles and \$150 for Unrecalled Vehicles.**

In addition to the cash payments, the Settlement provides for a New Parts Warranty for the new parts installed pursuant to the Recalls and a robust Hyundai and Kia Class Vehicle inspection program. Please visit [www.ACUSettlement.com](http://www.ACUSettlement.com) for more information.

## HOW DO I GET A PAYMENT?

You must submit a claim to receive a cash payment. The claims process is easy to complete and will require basic documentation to show your out-of-pocket expenses, such as a receipt or invoice, or a signed affidavit if you don't have a receipt or invoice.

To submit your claim online, please click the "File A Claim" link or scan the QR code below. You can also visit [www.ACUSettlement.com](http://www.ACUSettlement.com) and enter your Unique ID and PIN. If you would like to submit your claim by mail, you can download and print the claim form on the Settlement Website or call to request a form. The fastest option is to submit your claim online.

**You should submit your claim now.** Claim forms must be electronically submitted or postmarked no later than **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

**FILE A CLAIM**

**HOW DO I SUBMIT MY CLAIM ONLINE?**

Visit the Settlement Website at  
[www.ACUSettlement.com](http://www.ACUSettlement.com)  
or scan the QR code above.



Insert your Unique ID and PIN,  
fill out the claim form and  
submit.



Under the current schedule, the  
deadline to file your claim is **March  
29, 2027.**

**You should submit your claim now.**

**WHAT ARE MY OTHER OPTIONS?**

You may exclude yourself from or object to the Settlement by **August 25, 2025.**

If you exclude yourself, you will not receive any cash payments, but you will reserve your rights to sue Defendants over the claims that this Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound by the Court's orders and judgments like all other Class Members, even if you do not file a claim.

If you wish to object, the Court will consider your views in deciding whether to approve or reject this Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue. You cannot object if you exclude yourself from the Settlement.

For information on how to exclude yourself or object, visit [www.ACUSettlement.com](http://www.ACUSettlement.com).

**WHAT HAPPENS NEXT?**

The Court will hold a hearing on **September 29, 2025 at 8:30 a.m. PST**, to consider whether to grant final approval of the Settlement, award fees and costs to the attorneys representing the Class, and service awards to the Settlement Class Representatives. Co-Lead Counsel will ask the Court to award up to 33% of the Settlement Amount (*i.e.* up to \$20,493,033.30) to cover reasonable attorneys' fees plus costs they incurred in litigating this case and securing this nationwide Settlement for the Class. Co-Lead Counsel will also ask the Court to award each of the proposed Settlement Class Representatives a Service Award of up to \$2,500 each for their work in this litigation. You do not need to attend this hearing, but you are welcome to attend at your own expense. The hearing date may change, so please check the Settlement Website regularly for updates.

**Questions? Visit [www.ACUSettlement.com](http://www.ACUSettlement.com) or Call 1-866-287-0740**

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

# EXHIBIT B

*A federal court authorized this Notice.  
This is not a solicitation from a lawyer.*

**Cash Payments of up  
to \$350 and Other  
Benefits are Available  
for Eligible Current and  
Former Owners and  
Lessees of Certain  
Hyundai and Kia  
Vehicles.**

You are receiving this Notice because records indicate you may qualify for this class action settlement.

Questions?  
Visit [www.ACUSettlement.com](http://www.ACUSettlement.com)  
or  
Call 1-866-287-0740

Hyundai-Kia Airbag Control Unit Settlement  
c/o JND Legal Administration  
PO Box 91478  
Seattle WA 98111

**«Barcode»**

Postal Service: Please do not mark barcode

«Full\_Name»  
«CF\_CARE\_OF\_NAME»  
«CF\_ADDRESS\_1»  
«CF\_ADDRESS\_2»  
«CF\_CITY», «CF\_STATE» «CF\_ZIP»  
«CF\_COUNTRY»

**What is this Class Action Settlement about?**

You are receiving this Notice because you may be a Class Member in a proposed class action settlement in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). Class Members include current or former owners/lessees of Hyundai and Kia Class Vehicles. A list of the Hyundai and Kia Class Vehicles and other important information and case documents is available on the Settlement Website, [www.ACUSettlement.com](http://www.ACUSettlement.com).

The Settlement provides **\$62.1 million** to resolve claims that the Hyundai and Kia Class Vehicles contain defective ZF-TRW airbag control units that are vulnerable to a condition called electrical overstress, which may cause the vehicles' airbags and other safety features to fail during a collision. The Settling Defendants deny the claims but have agreed to settle. The Court has not decided who is right.

You have been identified as a potential Class Member based on records from Hyundai and Kia and the DMV. The purpose of this Notice is to inform you of the proposed class action settlement so you may decide what to do. **Your legal rights under the Settlement are affected even if you do nothing, so please read this Notice carefully.**

**The cash compensation available will be reimbursement for certain out-of-pocket expenses related to the Recalls and residual payments of up to \$350 for Recalled Vehicles and \$150 for Unrecalled Vehicles.**

In addition to the cash payments, the Settlement provides for a New Parts Warranty for the new parts installed pursuant to the Recalls and a robust Hyundai and Kia Class Vehicle inspection program. Please visit [www.ACUSettlement.com](http://www.ACUSettlement.com) for more information.

**How do I get a payment?**

You must submit a claim to receive a cash payment. The claims process is easy to complete and will require basic documentation to show your out-of-pocket expenses. To submit your claim online please visit [www.ACUSettlement.com](http://www.ACUSettlement.com). You can also download a claim form on the Settlement Website or call to request a form and submit your claim by mail. The fastest option is to submit your claim online.

**You should submit your claim now.** Claim forms must be electronically submitted or postmarked no later than **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.



**What are my other options?**

You may exclude yourself from or object to the Settlement by **August 25, 2025**. If you exclude yourself, you will not receive any cash payments, but you will keep your right to sue Defendants over the claims that this Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound by the Court's orders and judgments like all other Class Members, even if you do not file a claim. If you wish to object, the Court will consider your views in deciding whether to approve or reject this Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue. You cannot object if you exclude yourself from the Settlement. For information on how to exclude yourself or object, visit [www.ACUSettlement.com](http://www.ACUSettlement.com).

**What happens next?**

The Court will hold a hearing on **September 29, 2025 at 8:30 a.m. PST**, to consider whether to grant final approval of the Settlement, award fees and costs to the attorneys representing the Class, and service awards to the Settlement Class Representatives. Co-Lead Counsel will ask the Court to award up to 33% of the Settlement Amount (i.e. up to \$20,493,033.30 million) to cover reasonable attorneys' fees plus costs they incurred in litigating this case and securing this nationwide Settlement for the Class. Co-Lead Counsel will also ask the Court to award each of the proposed Settlement Class Representatives a service award of up to \$2,500 each for their work in this litigation. You do not need to attend this hearing, but you are welcome to attend at your own expense. The hearing date may change, so please check the Settlement Website regularly for updates.

**Questions?** Visit [www.ACUSettlement.com](http://www.ACUSettlement.com), call toll-free 1-866-287-0740, email [HKinfo@ACUSettlement.com](mailto:HKinfo@ACUSettlement.com), or write Hyundai-Kia Airbag Control Unit Settlement, c/o JND Legal Administration, PO Box 91478, Seattle WA 98111.

<b>YOUR VIN:</b>	XXXXXXXXXXXXXXXXXX
<b>YOUR UNIQUE ID:</b>	<<Unique_ID>>
<b>YOUR PIN:</b>	XXXXXXXX
<b>PLEASE REFER TO YOUR UNIQUE ID AND PIN TO FILE A CLAIM</b>	



*Carefully separate this Address Change Form at the perforation*

Name: \_\_\_\_\_

Current Address: \_\_\_\_\_

\_\_\_\_\_

**Address Change Form**

To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.

PLACE  
STAMP  
HERE

Hyundai-Kia Airbag Control Unit Settlement  
c/o JND Legal Administration  
PO Box 91478  
Seattle, WA 98111

# EXHIBIT C

Hyundai-Kia Airbag Control Unit Settlement  
c/o JND Legal Administration  
PO Box 91478  
Seattle, WA 98111

«Printer\_ID»



«Fullname»

«AddressLine1»

«AddressLine2»

«AddressCity», «AddressState» «AddressPostalCode»

**[DATE]**

**Hyundai-Kia Airbag Control Unit Settlement – Claim Filing Assistance for Owners or Lessees of more than 10 Hyundai and Kia Class Vehicles**

Dear «Fullname»,

You are receiving this letter because you may be eligible for compensation in a proposed class action settlement in a lawsuit called In Re: ZF-TRW Airbag Control Units Products Liability Litigation, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). The Settlement provides compensation to owners and lessees of certain Hyundai and Kia Vehicles (called the “Hyundai and Kia Class Vehicles”), and the estimated payments are up to **\$350** for Recalled Vehicles and **\$150** for Unrecalled Vehicles.

The Court granted preliminary approval of the Settlement on April 14, 2025, and ordered notices to be sent to potential Class Members, like you, to inform them of their legal rights under the Settlement. For more information about the Settlement, including your rights and options and the deadlines to exercise them, please review the enclosed, Court-ordered notice. You may also find up-to-date information related to the Settlement at [www.ACUSettlement.com](http://www.ACUSettlement.com).

DMV records indicate that you may have owned or leased more than 10 Hyundai and Kia Class Vehicles. As further described in the enclosed notice, you will need to submit a claim for these vehicles to seek compensation under the Settlement. A special process has been established to facilitate the bulk filing of claims for Class Members with more than 10 Hyundai and Kia Class Vehicles. To submit a bulk claim, please contact us by email at [HKInfo@ACUSettlement.com](mailto:HKInfo@ACUSettlement.com), or call 1-866-287-0740, and a representative specializing in bulk claims will assist you.

Claims must be submitted by **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

Please read the enclosed legal notice to learn about your rights and options under the Settlement, including important deadlines. For additional information about the proposed Settlement, please visit the Settlement Website at [www.ACUSettlement.com](http://www.ACUSettlement.com).

Regards,

Hyundai-Kia Airbag Control Unit Settlement Notice Administrator

# EXHIBIT D



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CRIME

HUMAN INTEREST

LIFESTYLE

ROYALS

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Cash Payments and Other Benefits Are Available  
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## Mariska Hargitay Recalls Feeling Like Her 'Life Was Over' After First Learning About Her Biological Father

Hargitay joined Alex Cooper on the latest episode of 'Call Her Daddy', where she discussed what it was like to discover the truth about her parentage

By [Alex Ross](#) | Published on June 25, 2025 03:14PM EDT


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**Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles**

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## Two-round NBA mock draft: What we're hearing hours from the draft

Round 1 of the NBA draft is tonight (8 ET on ABC and ESPN), and we have the intel on trade talks and picks.

2h • Jonathan Olivny and Jeremy Woo



### The 'abrupt reversal of fortune' that changed everything for Cooper Flagg and the Mavs

The presumptive No. 1 pick and the Mavs, still reeling from trading Luka Doncic, might be made for each other.

1d • Buster Holmes

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Arenas: 'Fighting time' to escape burning truck


Sportsbooks have Flagg in rare air for NBA draft

Inside a wild weekend with Canelo and Crawford

**LEGAL NOTICE**


**Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles**

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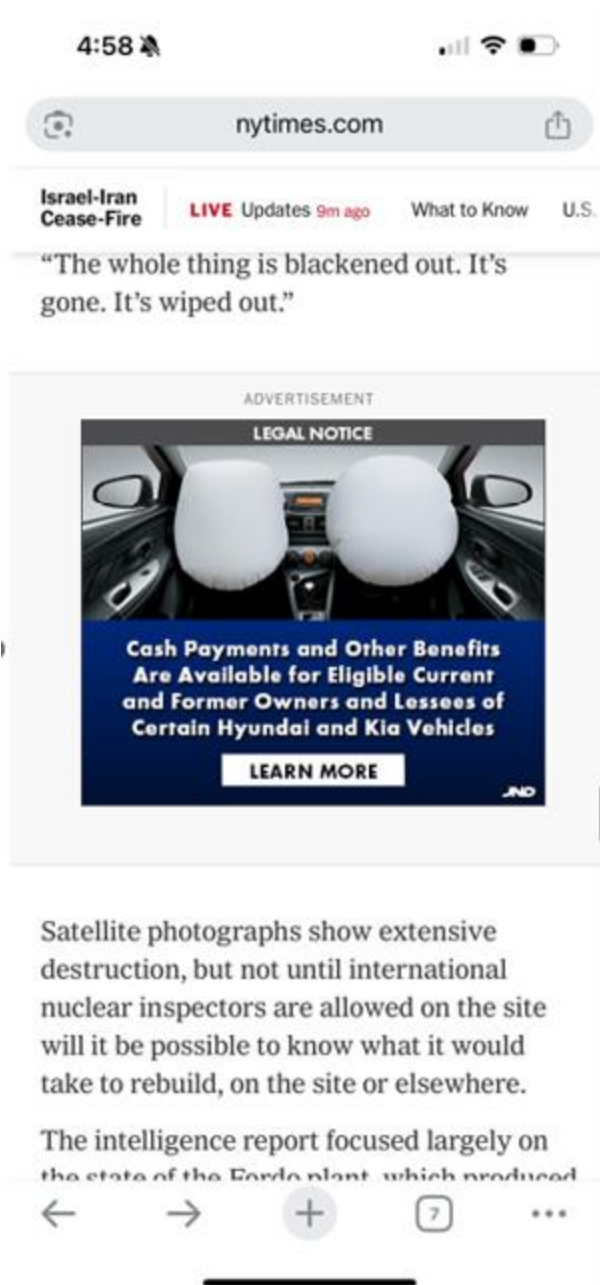
**ICYMI**

Spencer Strider has words for Juan Soto after strikeout

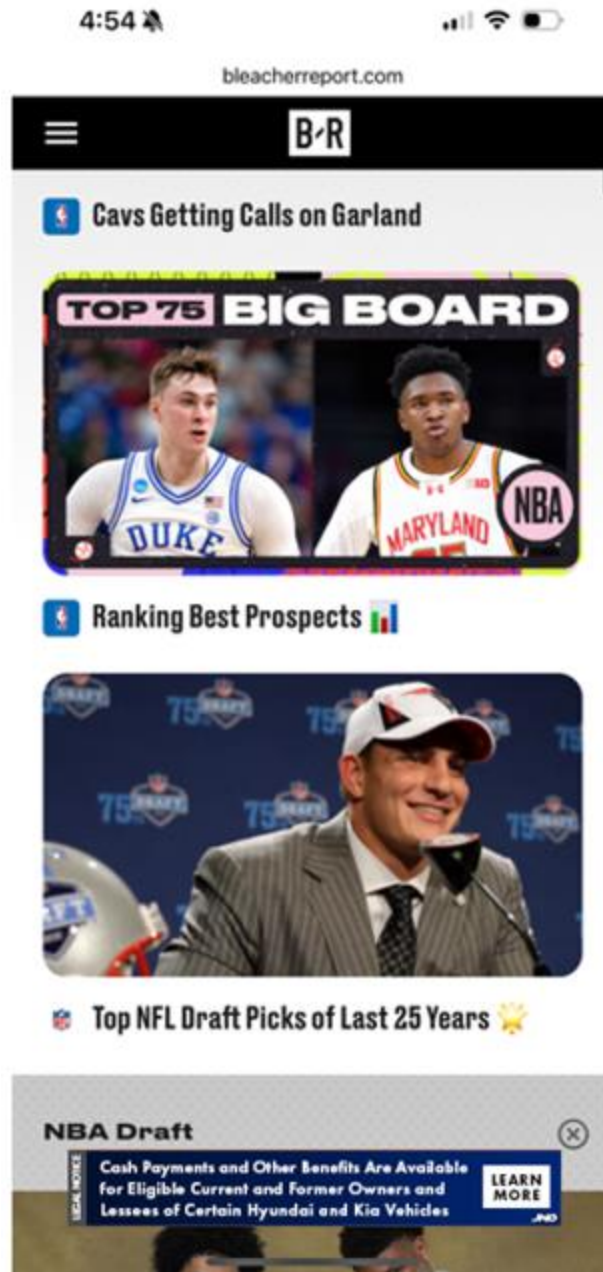
After striking out Juan Soto, Spencer Strider is caught on camera exchanging pleasantries with him.

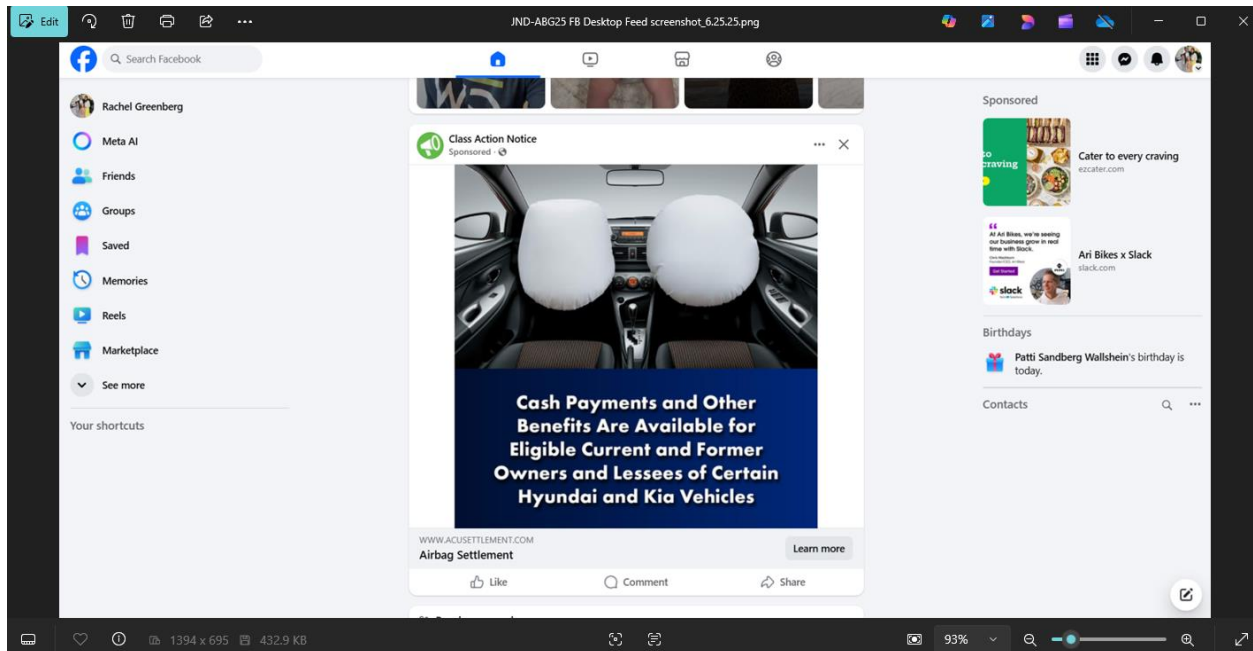


## 'Championships, fan experience, community:'









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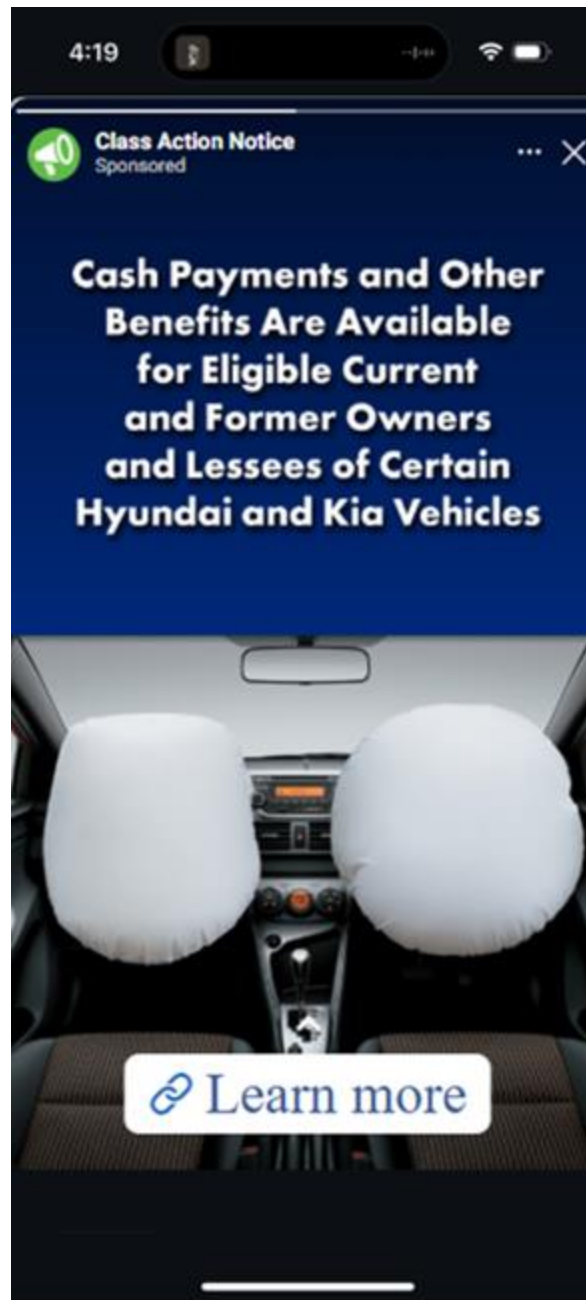
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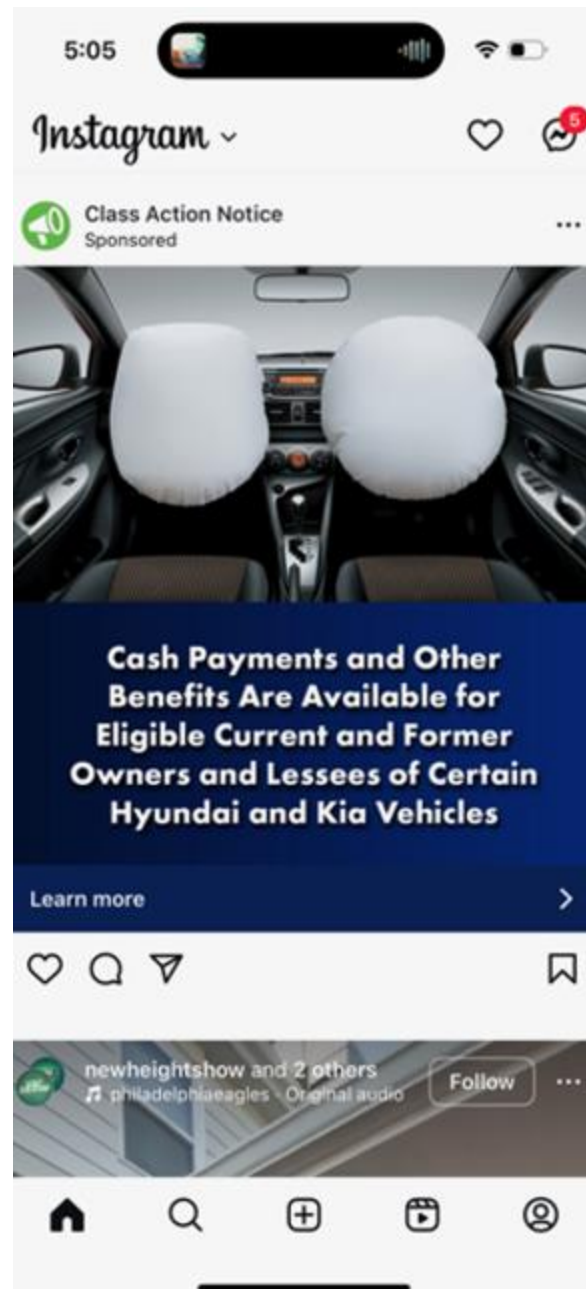
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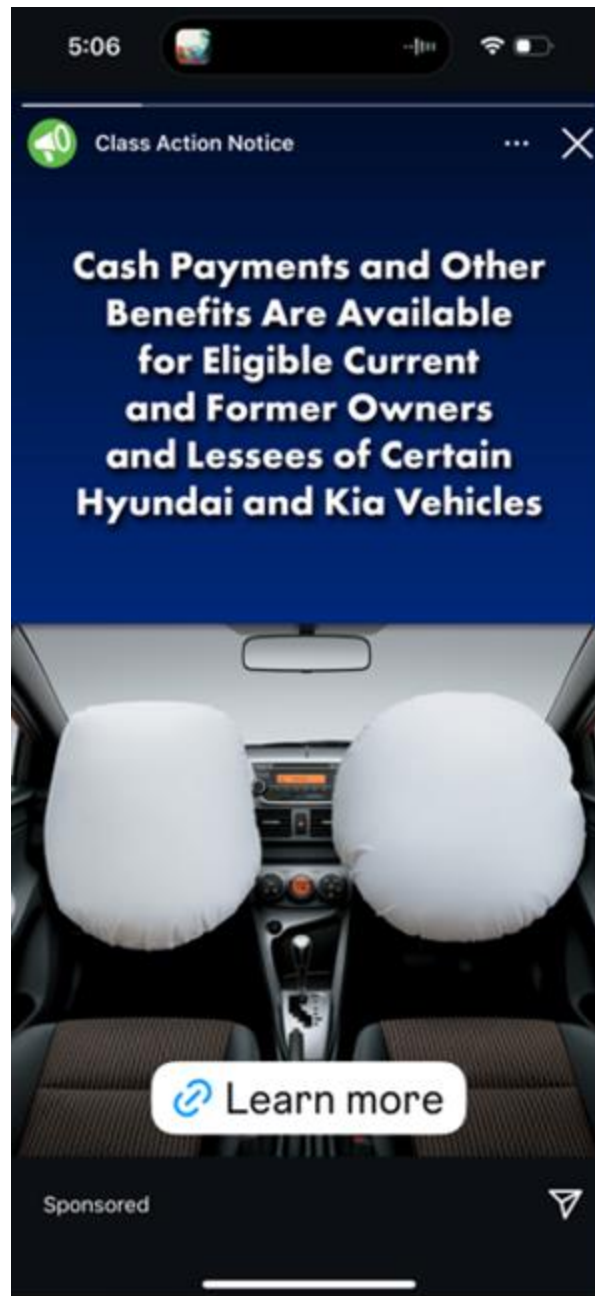
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# EXHIBIT E



hyundai-kia settlement

AI Mode **All** News Images Videos Short videos Shopping More ▾**Sponsored**[www.acusettlement.com/](https://www.acusettlement.com/)**Hyundai-Kia Vehicles Affected - Airbag Control Unit Settlement**

Cash payments up to \$350 and other benefits are available. File a Claim. Current and former owners and lessees of certain Hyundai and Kia vehicles are eligible.

[Key Dates](#) · [Important Documents](#)

Hyundai USA

<https://autoservice.hyundaiusa.com/SetRedirectView> ⋮**Hyundai Class Action Settlement**

Beginning February 12, 2024, eligible class members (current & previous owners of the subject vehicles) will receive notice of the Settlement by mail and email, ...

**People also ask** ⋮

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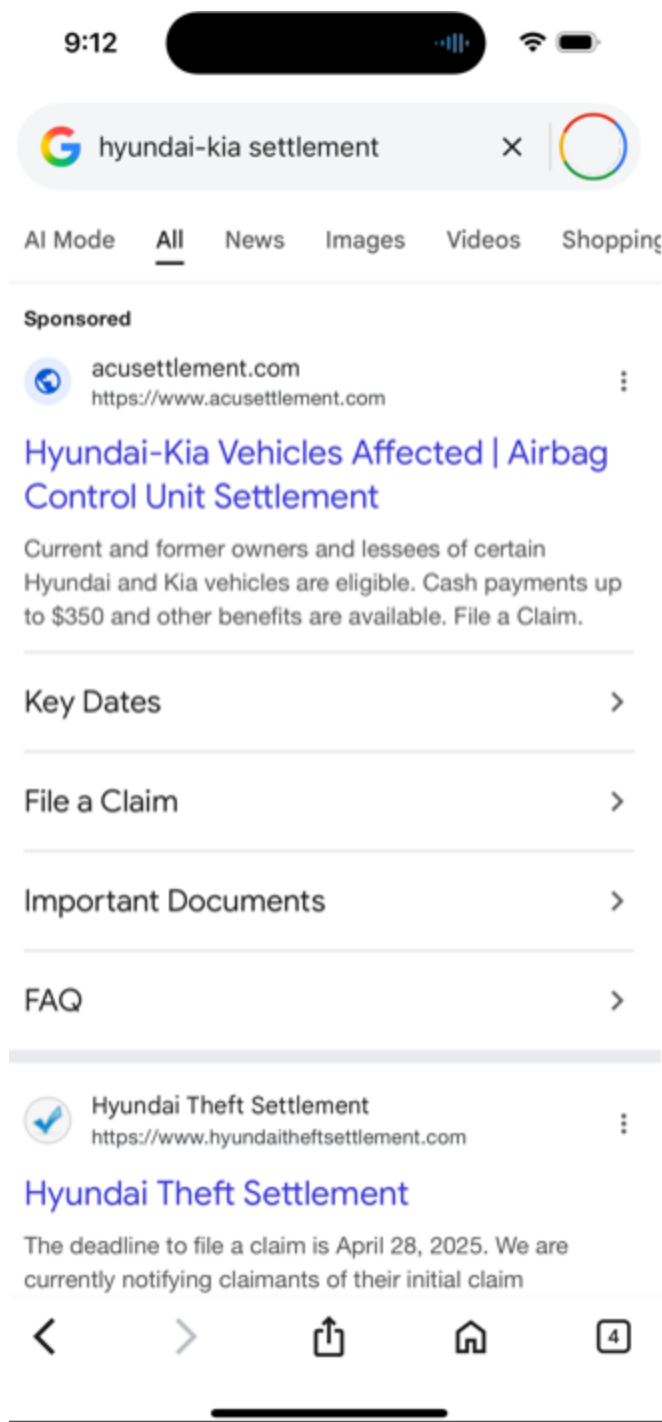
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Hagens Berman, Law Firm

<https://www.hbsslaw.com/faq> ⋮**Hyundai / Kia Car Theft Defect Lawsuit & Settlement FAQ**

Under the settlement, class vehicles ineligible for the software upgrade may file claims for reimbursement up to \$300 for the purchase of a steering wheel lock ...





# EXHIBIT F

# Cash payments of up to \$350 and other benefits are available for eligible current and former owners and lessees of Certain Hyundai and Kia vehicles

USA - English ▼

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NEWS PROVIDED BY  
**JND Legal Administration →**  
Jun 25, 2025, 09:25 ET

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SEATTLE, June 25, 2025 /PRNewswire/ -- **JND Legal Administration**

A proposed class action settlement has been reached in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). A list of the Hyundai and Kia Class Vehicles and other important information and case documents are available on the Settlement Website, **[www.ACUSettlement.com](http://www.ACUSettlement.com)**.

Class Members include all persons or entities who or which, on **April 14, 2025**, own or lease, or previously owned or leased, Hyundai and Kia Class Vehicles that were originally sold or leased in the United States or any of its territories or possessions. Eligibility will be determined by VIN. The Hyundai and Kia Class Vehicles are the:

- 2011-2019 Hyundai Sonata;
- 2011-2019 Hyundai Sonata Hybrid;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;
- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima Hybrid; and
- 2011-2012, 2014 Kia Sedona.

The Settlement provides \$62.1 million to resolve claims that the Hyundai and Kia Class Vehicles contain defective ZF-TRW airbag control units that are vulnerable to a condition called electrical overstress, which may cause the vehicles' airbags and other safety features to fail during a collision. The Settling Defendants deny the claims but have agreed to settle. The Court has not decided who is right.

The purpose of this Notice is to inform you of the proposed class action settlement so you may decide what to do. **Your legal rights under the Settlement are affected even if you do nothing, so please read this Notice carefully.**

The cash compensation available will be reimbursement for certain out-of-pocket expenses related to the Recalls and residual payments of up to \$350 for Recalled Vehicles and \$150 for Unrecalled Vehicles.

In addition to the cash payments, the Settlement provides for a New Parts Warranty for the new parts installed pursuant to the Recalls and a robust Hyundai and Kia Class Vehicle inspection program. Please visit [www.ACUSettlement.com](http://www.ACUSettlement.com) for more information.

### **How do I get a payment?**

You must submit a claim to receive a cash payment. The claims process is easy to complete and will require basic documentation to show your out-of-pocket expenses.

To submit your claim online please visit [www.ACUSettlement.com](http://www.ACUSettlement.com). You can also download a claim form on the Settlement Website or call to request a form and submit your claim by mail. The fastest option is to submit your claim online.

### **You should submit your claim now.**

Claim forms must be electronically submitted or postmarked no later than **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

### **What are my other options?**

You may exclude yourself from or object to the Settlement by **August 25, 2025**.

If you exclude yourself, you will not receive any cash payments and you will not release any of the claims that this Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound by the Court's orders and judgments like all other Class Members, even if you do not file a claim.

If you wish to object, the Court will consider your views in deciding whether to approve or reject this Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue. You cannot object if you exclude yourself from the Settlement.

For information on how to object or exclude yourself, visit [www.ACUSettlement.com](http://www.ACUSettlement.com).

### **What happens next?**

The Court will hold a hearing on **September 29, 2025 at 8:30 a.m. PDT**, to consider whether to grant final approval of the Settlement, award fees and costs to the attorneys representing the Class, and service awards to the Settlement Class Representatives. Co-Lead Counsel will ask the Court to award up to 33% of the Settlement Amount (*i.e.*, up to \$20,493,033.30) to cover reasonable attorneys' fees plus costs they incurred in litigating this case and securing this nationwide Settlement for the Class. Co-Lead Counsel will also ask the Court to award each of the proposed Settlement Class Representatives a service award of up

to \$2,500 each for their work in this litigation. You do not need to attend this hearing, but you are welcome to attend at your own expense. The hearing date may change, so please check the Settlement Website regularly for updates.

### Questions?

Visit [www.ACUSettlement.com](http://www.ACUSettlement.com) or call 1-866-287-0740.

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# Se ofrecen pagos en efectivo de hasta 350 dólares y otros beneficios a los propietarios y arrendatarios actuales y anteriores de determinados vehículos Hyundai y Kia que sean elegibles

MEXICO - Spanish ▼

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NOTICIAS PROPORCIONADAS POR

**JND Legal Administration →**

25 jun, 2025, 13:25 GMT

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SEATTLE, 25 de junio de 2025 /PRNewswire/ -- **JND Legal Administration**

Se ha llegado a un acuerdo de demanda colectiva propuesto en una demanda denominada *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Caso No. 2:19-ml-02905-JAK-JPR (Distrito Central de California). En el sitio web del Acuerdo se puede consultar una lista de los vehículos Hyundai y Kia afectados, así como otra información importante y documentos relacionados con el caso, **[www.ACUSettlement.com](http://www.ACUSettlement.com)**.

Los miembros del grupo de demandantes incluyen a todas las personas o entidades que, a fecha de **14 de abril de 2025**, sean propietarios o arrendatarios o hayan sido propietarios o arrendatarios anteriormente, de vehículos Hyundai y Kia del grupo que se vendieron o arrendaron originalmente en Estados Unidos o en cualquiera de sus territorios o posesiones. La elegibilidad se determinará mediante el número de identificación del vehículo (VIN, por sus siglas en inglés) Los vehículos afectados Hyundai y Kia son los siguientes:

- 2011-2019 Hyundai Sonata;
- 2011-2019 Hyundai Sonata híbrido;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;
- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima híbrido; y
- 2011-2012, 2014 Kia Sedona.

El Acuerdo proporciona 62,1 millones de dólares para resolver reclamos de que los vehículos afectados Hyundai y Kia contienen unidades de control de bolsas de aire ZF-TRW defectuosas que son vulnerables a una condición llamada sobrecarga eléctrica, que puede hacer que las bolsas de aire de los vehículos y otras características de seguridad fallen durante una colisión. Los demandados que concilian niegan los reclamos, pero han acordado llegar a un acuerdo. El tribunal no ha decidido quién tiene razón.

El propósito de este Aviso es informarle sobre el acuerdo de demanda colectiva propuesto para que pueda decidir qué hacer. **Sus derechos legales en virtud del acuerdo se ven afectados incluso si no hace nada, así que lea atentamente este Aviso.**

La compensación en efectivo disponible consistirá en el reembolso de ciertos gastos de bolsillo relacionados con las retiradas del mercado y pagos residuales de hasta 350 dólares por los vehículos retirados y 150 dólares por vehículos no retirados.

Además de los pagos en efectivo, el Acuerdo establece una garantía de piezas nuevas para las piezas nuevas instaladas de conformidad con las retiradas del mercado y un sólido programa de inspección de vehículos afectados Hyundai y Kia. Para obtener más información, visite [www.ACUSettlement.com](http://www.ACUSettlement.com)

### **¿Cómo obtengo un pago?**

Debe presentar una reclamación para recibir un pago en efectivo. El proceso de reclamos es fácil de completar y requerirá documentación básica para mostrar sus gastos de bolsillo.



Para enviar su reclamo en línea, visite [www.ACUSettlement.com](http://www.ACUSettlement.com). También puede descargar un formulario de reclamo en el sitio web del Acuerdo o llamar para solicitar un formulario y enviar su reclamo por correo. La opción más rápida es enviar su reclamo en línea.

### **Debe enviar su reclamo ahora.**

Los formularios de reclamo deben enviarse electrónicamente o tener matasellos a más tardar el **29 de marzo de 2027**. Este horario puede cambiar, por lo tanto visite el sitio web del Acuerdo regularmente para ver actualizaciones.

### **¿Cuáles son mis otras opciones?**

Puede excluirse u objetar el Acuerdo antes del **25 de agosto de 2025**.

Si se excluye, no recibirá ningún pago en efectivo y no renunciará a ninguno de los reclamos que resuelva este Acuerdo. Si no se excluye del Acuerdo, estará sujeto a las órdenes y sentencias del tribunal como todos los demás miembros del grupo de demandantes, incluso si no presenta una reclamación.

Si desea objetar, el tribunal tendrá en cuenta su opinión al decidir si aprueba o rechaza este Acuerdo. Si el tribunal no aprueba el Acuerdo, no se enviarán pagos en efectivo y la demanda continuará. No puede objetar si se excluye del Acuerdo.

Para obtener información sobre cómo objetar o excluirse, visite [www.ACUSettlement.com](http://www.ACUSettlement.com).

### **¿Y ahora qué sigue?**

El tribunal celebrará una audiencia el **29 de septiembre de 2025 a las 8:30 a. m. hora de verano del pacífico**, para considerar si otorgar la aprobación final del Acuerdo, se adjudican honorarios y costas a los abogados que representan al colectivo y se conceden compensaciones por los servicios prestados a los representantes del colectivo del Acuerdo. El abogado codefensor principal solicitará al tribunal que conceda hasta el 33 % del monto del Acuerdo (es decir, hasta 20.493.033,30 de dólares) para cubrir los honorarios razonables de los abogados más los costos en los que incurrieron al litigar este caso y asegurar este Acuerdo a nivel nacional para el colectivo. También solicitará al tribunal que otorgue a cada

uno de los representantes del colectivo del Acuerdo, propuestos una indemnización de servicio de hasta 2.500 dólares a cada uno por su trabajo en este litigio. No es necesario que asista a esta audiencia, pero puede hacerlo si lo desea, aunque deberá correr con sus propios gastos. La fecha de la audiencia puede cambiar, por lo tanto consulte el sitio web del Acuerdo regularmente para obtener actualizaciones.

**¿Tiene alguna pregunta?**

Visite **[www.ACUSettlement.com](http://www.ACUSettlement.com)** o llame al 1-866-287-0740.

FUENTE JND Legal Administration

# Pagamentos em dinheiro de até US\$ 350 e outros benefícios estão disponíveis para proprietários e arrendatários atuais e antigos elegíveis de certos veículos Hyundai e Kia

BRAZIL - Portuguese ▼

NOTÍCIAS FORNECIDAS POR

**JND Legal Administration →**

25 jun, 2025, 13:25 GMT

SEATTLE, 25 de junho de 2025 /PRNewswire/ -- **JND Legal Administration**

Um acordo proposto de ação coletiva foi realizado em uma ação judicial chamada *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, caso n.º 2:19-ml-02905-JAK-JPR (C.D. Cal.). Uma lista dos veículos das marcas Hyundai e Kia, além de outras informações importantes e documentos do processo, está disponível no site do acordo, **[www.ACUSettlement.com](http://www.ACUSettlement.com)**.

Os Membros da Classe incluem todas as pessoas ou entidades que, em **14 de abril de 2025**, possuam ou arrendem, ou anteriormente possuíram ou arrendaram, veículos das marcas Hyundai e Kia que foram originalmente vendidos ou arrendados nos Estados Unidos ou em qualquer um de seus territórios ou posses. A elegibilidade será determinada pelo VIN. Os veículos das marcas Hyundai e Kia são:

- 2011-2019 Hyundai Sonata;
- Hyundai Sonata Hybrid 2011-2019;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;
- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima Hybrid; e
- 2011-2012, 2014 Kia Sedona.

O Acordo fornece US\$ 62,1 milhões para resolver reclamações de que os veículos das marcas Hyundai e Kia contêm unidades de controle de airbag ZF-TRW defeituosas que são vulneráveis a uma condição chamada sobrecarga elétrica, o que pode fazer com que os airbags dos veículos e outros recursos de segurança falhem durante uma colisão. Os Réus do Acordo negam as reivindicações, mas concordaram em resolver. O tribunal não decidiu quem está certo.

O objetivo deste aviso é informá-lo sobre o acordo de ação coletiva proposto para que você possa decidir o que fazer. **Seus direitos legais sob o acordo são afetados mesmo que você não faça nada, então leia este aviso com atenção.**

A compensação em dinheiro disponível será o reembolso de certas despesas diretas relacionadas aos recalls e pagamentos residuais de até US\$ 350 para veículos recolhidos e US\$ 150 para veículos não recolhidos.

Além dos pagamentos em dinheiro, o acordo prevê uma garantia de peças novas para as novas peças instaladas de acordo com os recalls e um robusto programa de inspeção de veículos das marcas Hyundai e Kia. Acesse [www.ACUSettlement.com](http://www.ACUSettlement.com) para obter mais informações.

### **Como recebo um pagamento?**

Você deve enviar uma solicitação para receber um pagamento em dinheiro. O processo de reivindicação é fácil de concluir e exigirá documentação básica para mostrar suas despesas diretas.

Para enviar a sua reclamação online, acesse [www.ACUSettlement.com](http://www.ACUSettlement.com). Você também pode baixar um formulário de reivindicação no site do acordo ou ligar para solicitar um formulário e enviar sua reivindicação por correio. A opção mais rápida é enviar sua reivindicação online.

### **Você deveria enviar a sua reivindicação agora.**

Os formulários de solicitação devem ser enviados eletronicamente ou carimbados até **29 de março de 2027**. Este cronograma pode mudar, portanto, visite o site do acordo regularmente para obter atualizações.

### **Quais são as minhas outras opções?**

Você pode se excluir ou se opor ao acordo até **25 de agosto de 2025**.

Se você se excluir, não receberá nenhum pagamento em dinheiro e não liberará nenhuma das reivindicações que este acordo resolve. Se você não se excluir do acordo, estará vinculado às ordens e julgamentos do Tribunal, como todos os outros Membros da Classe, mesmo que não apresente uma reivindicação.

Se você desejar contestar, o tribunal considerará suas opiniões ao decidir se aprova ou rejeita este acordo. Se o tribunal não aprovar o acordo, nenhum pagamento em dinheiro será enviado e o processo continuará. Você não pode se opor caso escolha se excluir do acordo.

Para obter informações sobre como se opor ou excluir, acesse [www.ACUSettlement.com](http://www.ACUSettlement.com).

### **O que acontece a seguir?**

O Tribunal realizará uma audiência em **29 de setembro de 2025 às 8h30. PDT**, para considerar se deve conceder a aprovação final do acordo, conceder honorários e custos aos advogados que representam a classe, e prêmios de serviço aos representantes da classe do acordo. O advogado colíder solicitará ao tribunal que conceda até 33% do valor do acordo (*ou seja*, até US\$ 20.493.033,30) para cobrir os honorários advocatícios razoáveis, mais os custos incorridos no litígio deste caso e na garantia deste acordo nacional para a classe. O advogado principal conjunto também solicitará ao tribunal que conceda a

cada um dos representantes de classe de acordo propostos uma concessão de serviço de até US\$ 2.500 cada por seu trabalho neste litígio. Você não precisa comparecer a esta audiência, mas pode participar por sua própria conta, se desejar. A data da audiência pode mudar, portanto, verifique o site do acordo regularmente para atualizações.

### **Dúvidas?**

Acesse **[www.ACUSettlement.com](http://www.ACUSettlement.com)** ou ligue para 1-866-287-0740.

FONTE JND Legal Administration