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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

**SUPPLEMENTAL
DECLARATION OF JENNIFER
M. KEOUGH RE: 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. I previously submitted a Declaration on the Settlement Notice Program
9 on March 17, 2025 (ECF 1027-2) and a Declaration on Settlement Notice Program
10 Progress on July 15, 2025 (ECF 1046-2). I submit this Declaration to provide an
11 update on the implementation of the Settlement Notice Program.

12 **DIRECT NOTICE**

13 3. As outlined in my previous declaration, on June 6, 2025 JND
14 commenced sending Email Notice to all potential Class Members with a valid email
15 address. The Email Notice campaign concluded on July 3, 2025 with a total of
16 6,070,187 Email Notices, of which 642,216 bounced back and were not deliverable.
17 Based on JND’s experience in other cases, this non-deliverable rate of 10.6% is
18 typical. As described below, JND supplemented the direct email notice campaign
19 by sending Postcard Notices to the Class Members whose email notices bounced
20 back as undeliverable.

21 4. The direct mail notice campaign was completed on July 21, 2025.
22 Postcard Notices were sent to 3,086,639 Potential Class Members for whom an
23 Email Notice bounced back as undeliverable, or for whom a valid email address
24 was not obtained.

25 5. For the 6,140 potential Class Members who have more than 10 VINs
26 associated with their name and address, JND sent a cover letter that included
27 language from the Postcard Notice to advise them of the process to submit a bulk
28 claim for more than 10 Hyundai and/or Kia Subject Vehicles.

1 6. As of the date of this declaration, 357,682 Postcard Notices were
2 undeliverable to their original addresses, of which 29,228 were forwarded by the
3 United States Postal Service and 105,725 were remailed by JND to updated
4 addresses. Additionally, JND has received 1,004 Bulk Claim Notices returned as
5 undeliverable.

6 7. Notices returned with a forwarding address are promptly re-mailed to
7 the forwarding address provided. For Notices returned without a forwarding
8 address, JND conducts advanced address research using available skip-tracing tools
9 and promptly re-mails to any verified updated address that is obtained.

10 8. The overall deliverability rate of the direct notice effort is greater than
11 96%.

12 **SUPPLEMENTAL DIGITAL NOTICE**

13 9. As detailed my previous declaration, JND supplemented the direct
14 notice effort with a four-week digital campaign that ran through the Google Display
15 Network (“GDN”), Facebook, and Instagram.

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

26 11. The digital ads included an embedded link to the Settlement Website,
27 where potential Class Members can get more information about the Settlement and
28

1 file a claim online. A total of 23,516,304 digital impressions were served from June
2 25, 2025 through July 22, 2025, totaling 2,516,304 more than originally planned.¹

3 12. From June 25, 2025 through July 22, 2025, JND caused 20,669
4 additional impressions to be served through an internet search campaign. When
5 purchased keywords/phrases related to the Settlement (e.g., content on the
6 Settlement Website landing page) were searched, a paid Responsive Search Ad
7 (“RSA”) with a hyperlink to the Settlement Website would sometimes appear on
8 the search engine results page. When the RSA was clicked on, the visitor was
9 redirected to the Settlement Website where they could get more information about
10 the Settlement. The search effort was monitored and optimized for
11 keywords/phrases that resulted in the best click-throughs/conversions.

12 13. As outlined in my previous declaration, JND caused a press release to
13 be distributed on June 25, 2025 to over 5,000 media outlets throughout the U.S.,
14 Guam, Full Latin America (to reach Puerto Rico), US Virgin Islands, and Pacific
15 Islands (to reach other territories/possessions). As of the date of this declaration, the
16 press release was picked up 521 times with a potential audience of 64.2 million.

17 **SETTLEMENT WEBSITE**

18 14. As outlined in my previous declaration, on April 21, 2025, JND
19 launched an interactive, case-specific Settlement Website at
20 www.ACUSettlement.com/hyundaikia. This site is located at a subdomain of the
21 ACU Settlements Website, which also provides information about other related
22 settlements.

23 15. As of the date of this declaration, the Settlement Website has tracked a
24 total of 164,787 unique users who registered 222,226 sessions. JND will continue
25
26

27 ¹ 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 to update and maintain the Settlement Website throughout the Settlement
2 administration process.

3 **TOLL-FREE NUMBER, EMAIL ADDRESS AND P.O. BOX**

4 16. As outlined in my previous declaration, JND maintains a 24-hour, toll-
5 free telephone line that Class Members can call to obtain information about the
6 Settlement. During business hours, JND's call center is staffed with operators who
7 are trained to answer questions about the Settlement. As of the date of this
8 declaration, JND has received 9,361 calls to the toll-free number, of which 3,393
9 have spoken with a live agent.

10 17. As outlined in my previous declaration, JND has established a
11 dedicated email address, HKinfo@ACUSettlement.com, to receive and respond to
12 potential Class Member inquiries. As the date of this declaration, JND has received
13 1,846 emails to this email inbox.

14 18. As outlined in my previous declaration, JND has established a
15 dedicated post office box to receive Class Member correspondence, paper Claim
16 Forms, and exclusion requests.

17 **CLAIMS RECEIVED**

18 19. As of the date of this declaration, and with the claims period still
19 ongoing, JND has received 79,674 Claims, of which 79,414 were submitted
20 electronically online and 260 were submitted via mail.

21 20. JND will continue to receive and process Claim Form submissions and
22 will continue to report to Counsel on the status of the claim intake and review. If a
23 claim is deficient, JND will provide the claimant with an opportunity to cure the
24 deficiencies.

25 21. The claim filing deadline for Class Members is anticipated as March
26 29, 2027, but it is subject to change depending on when the Settlement receives
27 final approval.
28

OBJECTIONS

22. 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 the date of this declaration, JND has received or is otherwise aware of three objections.

REQUESTS FOR EXCLUSION

23. 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 the date of this declaration, JND has received 97 requests for exclusion, of which 68 were timely and valid. Of the timely but deficient requests for exclusion, the most common deficiencies are attributed to the lack of a valid VIN or date of purchase/lease of the Subject Vehicle. JND will consult with the Parties as to the grounds for these deficiencies. A report of received requests for exclusion is attached as **Exhibit A**. To the extent necessary, including to reflect any timely postmarked exclusion requests not yet received, JND will provide an updated report of requests for exclusion in advance of the Final Approval Hearing.

REACH

24. The direct notice effort alone successfully reached more than 96% of the potential Class Members. The supplemental digital effort, internet search campaign, and distribution of a press release further enhanced that reach. The expected reach exceeds that of other court-approved programs and is on the high end of the 70-95% reach standard set forth by the Federal Judicial Center.²

² Federal Judicial Center, Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide (2010), p. 3 states: “...the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%.”

CONCLUSION

25. In my opinion, the Notice Program has been a success. The Notice Program was designed and executed to reach virtually all Class Members, and it constitutes the best practicable notice to the Class.

26. JND will continue to provide regular reports to the Parties with updates as to the claim rate, claim validation, deficient claim outreach, and other relevant details regarding our administration of the Settlement.

27. JND will consult with the Parties on the efficacy, timing, and strategy for any supplemental or reminder notice campaigns before the conclusion of the claims program in 2027.

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

Executed September 8, 2025, at Seattle, Washington.

By: 
Jennifer M. Keough

EXHIBIT A



Hyundai-Kia Airbag Control Unit Settlement
(USDC Central District of California, Case No. 2:19-ml-02905-JAK-JPR)

Exclusion Requests

#	Name	Last Four Digits of VIN	Make	Status
1	CHRISTOPHER BINNS	3579	Hyundai	Valid
2	STEPHEN WINSTEAD	2501	Kia	Valid
3	DAVIS GIGOGNE	6022	Hyundai	Valid
4	LEO NOTARO	7174	Hyundai	Valid
5	DONALD LOWE	0215	Hyundai	Valid
6	PATRICIA LOWE	0215	Hyundai	Valid
7	DEREK ROGGE	6965	Hyundai	Valid
8	DIANE CRAVER	3345	Kia	Valid
9	REBECCA VOYSEY	9941	Kia	Valid
10	CRAIG VOYSEY	9941	Kia	Valid
11	DAVID AXT	7511	Hyundai	Valid
12	CHRISTINA CRUCE	0268	Hyundai	Valid
13	CALISTA BOGGESS	9283	Hyundai	Valid
14	SUSAN DYBAS	0090	Kia	Valid
15	HARESH PATEL	8922	Hyundai	Valid
16	RASHIDA FFRENCH	7092	Hyundai	Valid
17	JANNA RUSSELL	7806	Hyundai	Valid
18	RETTA STACKS	8097	Hyundai	Valid
19	KELLIE BECKETT	4784	Hyundai	Valid
20	JOHN NELSON	1979	Hyundai	Valid
21	MARY BUNGE	3296	Hyundai	Valid
22	NANCY LUND	4742	Hyundai	Valid
23	LOUIS LOCKLEAR	7856	Hyundai	Valid
24	KIMBERLY HOLTEL	5244	Kia	Valid
25	KATHRYN NUGENT	5326	Kia	Valid
26	THOMAS WILSON	2589	Hyundai	Valid
27	JODY HECHER	6125	Hyundai	Valid
28	BRIAN BOYD BURBIDGE	1878	Hyundai	Valid
29	ANGELA BURBIDGE	1878	Hyundai	Valid
30	MERRIT BACHMAN	3029	Hyundai	Valid
31	PATRICIA WALLACE	4431	Hyundai	Valid
32	CHATHAPURAM NARAYANAN	9688	Kia	Valid
33	WILLIAM LORS	6226	Kia	Valid
34	MYRA EMMETT	6049	Hyundai	Valid
35	NICOLE ROJAS	7252	Hyundai	Valid
36	JAY ROSIENSKI	1764	Hyundai	Valid
37	SUSAN ROSIENSKI	1764	Hyundai	Valid



Hyundai-Kia Airbag Control Unit Settlement

(USDC Central District of California, Case No. 2:19-ml-02905-JAK-JPR)

Exclusion Requests

#	Name	Last Four Digits of VIN	Make	Status
38	STEFAN BREWER	5868	Hyundai	Valid
39	JACQUELINE ESCOBAR COPELAND	7921	Kia	Valid
40	VICTOR COPELAND	7921	Kia	Valid
41	JACQUELYN BIANCHI	7510	Hyundai	Valid
42	MARJORIE QUINN	6194	Kia	Valid
43	ANDREA CONNER	6272	Hyundai	Valid
44	RACHAEL FUNK	3734	Hyundai	Valid
45	JANEL WILLIAMS	0448, 2817	Kia, Kia	Valid
46	JAMES CASTRO	4580	Kia	Valid
47	MELINDA HAMILTON	0092	Hyundai	Valid
48	ALLEN SCHROEDER	6151, 4783	Hyundai, Hyundai	Valid
49	RICHARD FLEMING	6662	Kia	Valid
50	HA CHOE	7853	Hyundai	Valid
51	SUSAN SMITH	0153	Hyundai	Valid
52	ESTATE OF SCARLETT SMITH	0153	Hyundai	Valid
53	LINDA BERQUIST	5114	Kia	Valid
54	THEODORE BERQUIST	5114	Kia	Valid
55	JOSEPH ELLIS	7083	Kia	Valid
56	SANDRA CHARBONEAU	8091	Hyundai	Valid
57	MELINDA SKAUGHT	1032	Hyundai	Valid
58	LILIANA EVELINA ALCALA-WILLIAMS	8478	Kia	Valid
59	ANNITA DAVIS	4757, 7495	Hyundai, Hyundai	Valid
60	DARYL DAVIS	3602, 1799	Hyundai, Hyundai	Valid
61	CATHERINE NUCKOLS	9682	Kia	Valid
62	KRISTIN NUCKOLS	4023	Hyundai	Valid
63	MARIE PALUMBO	8887	Hyundai	Valid
64	JOHN PIETRKOWSKI	6658	Hyundai	Valid
65	ELLEN DORSI	9611	Hyundai	Valid
66	JENNIFER LIBERTY	9611	Hyundai	Valid
67	CARTER ROHMILLER	6000	Kia	Valid
68	ERIK BALKAN	2377	Hyundai	Valid
69	MARTIN BLANDON	6449	Hyundai	Deficient
70	MICHELE DIETZ	3541	Hyundai	Deficient
71	DOUGLAS LEHIGH	1463	Hyundai	Deficient
72	THERESA LEHIGH	1463	Hyundai	Deficient
73	THOMAS ARNDT	Not Provided	Hyundai	Deficient
74	BOBBY MARSH	Not Provided	Hyundai	Deficient



Hyundai-Kia Airbag Control Unit Settlement

(USDC Central District of California, Case No. 2:19-ml-02905-JAK-JPR)

Exclusion Requests

#	Name	Last Four Digits of VIN	Make	Status
75	ANTHONY DIGIUSEPPE	Not Provided	Hyundai	Deficient
76	ROSE DIGIUSEPPE	Not Provided	Hyundai	Deficient
77	TANGELIA WILLIAMS	0443	Hyundai	Deficient
78	RICHARD LUND	4742	Hyundai	Deficient
79	FRED JUNGBLUT	6029	Hyundai	Deficient
80	SHARON PARADOWSKI	1554	Hyundai	Deficient
81	STACI BITTING	5396	Hyundai	Deficient
82	COREY GOODNIGHT	9788	Kia	Deficient
83	ANTHONY SANTOYA	6655	Hyundai	Deficient
84	MICHAEL SHERMAN	4596	Hyundai	Deficient
85	MARCIA MAZE	Not Provided	Hyundai	Deficient
86	ROXANNE HAWKSLEY	Not Provided	Hyundai	Deficient
87	SHELIA BOSHER	4597	Kia	Deficient
88	ROSEMARIE WILSON	2521	Hyundai	Deficient
89	KATHRYN MCNEVIN	Not Provided	Kia	Deficient
90	ESTATE OF ARNIE ZIEGLER	1144	Hyundai	Deficient
91	ISABEL BURROWS	9528	Hyundai	Deficient
92	MELUN WEHELEYE	7017	Kia	Deficient
93	ANGELA BUECHEL	9482	Hyundai	Late
94	JACQUELINE SCHAFER	6756	Kia	Late
95	JOSHUA DURHAM	7550	Hyundai	Late
96	LYNETTE NEEL	7550	Hyundai	Late
97	KEITH VOLPE	3459	Kia	Late