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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
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14 *In re ZF-TRW Airbag Control Units*
15 *Products Liability Litigation*

16 ALL CASES AGAINST THE
17 HYUNDAI-KIA AND MOBIS
18 DEFENDANTS
19

MDL No. 2905

Judge: John A. Kronstadt

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**[PROPOSED] FINAL JUDGMENT AS
TO THE HYUNDAI-KIA PLAINTIFFS'
CLAIMS**

Pursuant to Federal Rules of Civil Procedure 23 and 58, and the Court's Final Order Approving Class Action Settlement, And Granting Attorneys' Fees, Expenses, And Service Awards (the "Final Approval Order"), the Court hereby orders, adjudges, finds, and decrees as follows:

1. The Court hereby **CERTIFIES** the Settlement Class and **GRANTS** the Motion for Final Approval of the Settlement. The Court fully and finally approves the Settlement in the form contemplated by the Settlement Agreement (ECF 1027-1) and finds its terms to be fair, reasonable and adequate within the meaning of Fed. R. Civ. P. 23. The Court directs the consummation of the Settlement pursuant to the terms and conditions of the Settlement Agreement.

2. The Court **CONFIRMS** the appointment of Co-Lead Plaintiffs' Counsel and the members of the Plaintiffs Steering Committee listed in the Order re Motion for Preliminary Approval of Class Settlement and Direction of Notice Under Fed R. Civ. P. 23(e) (ECF 1036) at 26, and the Settlement Agreement (ECF 1027-1) as Settlement Class Counsel.

3. The Court **CONFIRMS** the appointment of Larae Angel, Bobbi Jo Birk-LaBarge, John Colbert, Brian Collins, Gerson Damens, Bonnie Dellatorre, Dylan DeMoranville, Joseph Fuller, Tina Fuller, Lawrence Graziano, Michael Hernandez, Kinyata Jones, Diana King, Richard Kintzel, Carl Paul Maurilus, Kenneth Ogorek, Burton Reckles, Dan Sutterfield, Amanda Swanson, and Lore Van Houten as Settlement Class Representatives.

4. The Court **CONFIRMS** the appointment of the JND Legal Administration LLC as the Settlement Notice and Claims Administrator that will oversee the Class Notice Program and administer the Settlement Fund.

5. The Court **GRANTS** Settlement Class Counsel's request for attorneys' fees and costs, and **AWARDS** Settlement Class Counsel \$20,093,033.30 in attorneys' fees and \$400,000 in reasonable expenses, to be paid from the Settlement

1 Fund and allocated by Co-Lead Counsel among the firms that performed work
2 consistent with the Common Benefit Order (ECF 111).

3 6. The Court **AWARDS** service awards of \$2,500 to each of the twenty
4 Settlement Class Representatives identified in paragraph 3 above, to be paid from
5 the Settlement Fund.

6 7. As set forth in the Final Approval Order, the Release from Section VII
7 of the Settlement Agreement (ECF 1027-1) shall take effect from the date of this
8 Final Judgment.

9 8. The individuals and entities listed in Appendix A to the Final Approval
10 Order are excluded from the Settlement Class.

11 9. The Court hereby permanently bars and enjoins any Settlement Class
12 Member from instituting or prosecuting any claims released pursuant to this
13 Settlement against the Released Parties, as those terms are used and defined in the
14 Settlement Agreement.

15 10. The Court further reserves and retains exclusive and continuing
16 jurisdiction over the Settlement concerning the administration and enforcement of
17 the Settlement Agreement and to effectuate its terms.

18 11. For the reasons stated in the Court's Final Order, judgment is entered
19 in accordance with the Final Order, and the claims of Plaintiffs Larae Angel, Bobbi
20 Jo Birk-LaBarge, John Colbert, Brian Collins, Gerson Damens, Bonnie Dellatorre,
21 Dylan DeMoranville, Joseph Fuller, Tina Fuller, Lawrence Graziano, Michael
22 Hernandez, Kinyata Jones, Diana King, Richard Kintzel, Carl Paul Maurilus,
23 Kenneth Ogorek, Burton Reckles, Dan Sutterfield, Amanda Swanson, and Lore
24 Van Houten in this Action against the Settling Defendants are dismissed with
25 prejudice, without costs to any party, except as otherwise provided in the Final
26 Order or in the Settlement Agreement.

27 12. Under Rule 54(b) of the Federal Rules of Civil Procedure, no just
28 reason exists for delay in entering final judgment pursuant to the Final Order. The

1 Court accordingly directs the Clerk to enter final judgment pursuant to Rule 58 of
2 the Federal Rules of Civil Procedure in accordance with the Final Order.

3 SO ORDERED this ____ day of _____ 2025.
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6 HON. JOHN A. KRONSTADT
7 United States District Court
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