

Mitsubishi Airbag Control Unit Settlement Notice

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

Cash payments and other benefits are available for eligible current and former owners and lessees of certain Mitsubishi vehicles.

Estimated cash payments are expected to be up to \$250 per Mitsubishi Class Vehicle with the potential for additional payments of unclaimed funds.

Mitsubishi Motors Corporation and Mitsubishi Motors North America, Incorporated (together, “Mitsubishi”) have agreed to a proposed class action settlement to resolve claims in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (the “Settlement”).¹ The lawsuit alleges that the Mitsubishi Class Vehicles (defined below) contain defective ZF-TRW airbag control units (“ZF-TRW ACUs”) that are vulnerable to a condition called electrical overstress, which may cause the vehicles’ airbags and other safety features to fail during a collision.

Mitsubishi denies the allegations in the lawsuit but has agreed to the Settlement to resolve the case. The Court has not decided who is right. The purpose of this notice is to provide you with important information about the 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.**

If approved, the Settlement will provide cash compensation and other benefits to Class Members. These benefits are:

1. A \$8,500,000 Settlement Fund to pay Class Members who submit a valid claim. **The estimated cash payments will be up to \$250 per Mitsubishi Class Vehicle, depending on the volume of claims submitted and court-awarded fees and costs.** Please review **Question 5** for details on how cash payments will be allocated if more than one Class Member submits a valid claim for the same Mitsubishi Class Vehicle; and
2. A robust Mitsubishi Class Vehicle inspection program.

You may be eligible for these benefits if on **November 1, 2024**, you own, lease, or previously owned or leased a Mitsubishi Class Vehicle. The Mitsubishi Class Vehicles are the:

- 2013-2017 Mitsubishi Lancer;
- 2013-2015 Mitsubishi Lancer Evolution;
- 2013-2015 Mitsubishi Lancer Ralliart;
- 2013-2016 Mitsubishi Lancer Sportback; and
- 2013 Mitsubishi Outlander.

To determine whether your vehicle is part of the Class, please visit the Settlement website, www.ACUSettlement.com, which contains a Vehicle Identification Number (“VIN”) lookup tool to check the eligibility of your vehicle.

For their work in securing this Settlement, the attorneys representing the Class will request up to 30% of the Settlement Amount (i.e. up to \$2.55 million) in attorneys’ fees and costs. Counsel will also request service awards of up to \$2,500 for each of the Settlement Class Representatives who brought this lawsuit

¹ Capitalized terms have the meaning assigned to them in the Settlement Agreement, unless otherwise noted.

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Questions? Visit www.ACUSettlement.com or call toll-free at 1-855-680-6395

(the “Class Representative service awards”). If approved by the Court, the attorneys’ fees and costs, and Class Representative service awards, will be paid out of the Settlement Fund.

This notice provides a summary of the Settlement, and it is important that you review it carefully to understand your legal rights. The full details of the Settlement, including the Class Action Settlement Agreement and other important case documents, are available at www.ACUSettlement.com. Please visit the website regularly for further updates about the Settlement.

WHAT THIS NOTICE CONTAINS

Basic Information 3

1. WHAT IS THIS NOTICE AND LAWSUIT ABOUT? 3

Who is in the Class?..... 4

2. AM I PART OF THE CLASS? 4

3. IS ANYONE EXCLUDED FROM THE SETTLEMENT?..... 4

Settlement Benefits – What Class Members Get 5

4. WHAT DOES THE SETTLEMENT PROVIDE? 5

5. HOW MUCH CASH COMPENSATION WILL I RECEIVE IF I FILE A CLAIM?..... 5

6. HOW DO I SUBMIT A CLAIM FOR CASH COMPENSATION? 5

7. WHEN WILL I GET MY PAYMENT?..... 6

8. HOW DOES THE SETTLEMENT INSPECTION PROGRAM WORK?..... 6

9. WHAT HAPPENS TO ANY UNCLAIMED FUNDS IN THE SETTLEMENT?..... 6

Understanding the Class Action Process 6

10. WHAT IS A CLASS ACTION?..... 6

11. WHAT AM I GIVING UP TO REMAIN A MEMBER OF THE CLASS?..... 7

12. WHAT HAPPENS IF I DO NOTHING AT ALL?..... 7

Excluding Yourself from the Settlement 7

13. HOW DO I GET OUT OF THE SETTLEMENT? 7

14. IF I DO NOT EXCLUDE MYSELF, CAN I SUE THE DEFENDANTS FOR THE SAME THING LATER? 8

15. IF I EXCLUDE MYSELF, CAN I STILL GET A SETTLEMENT PAYMENT?..... 8

The Lawyers Representing You 8

16. DO I HAVE A LAWYER IN THE CASE? 8

17. HOW WILL THE LAWYERS BE PAID? 8

Objecting to the Settlement..... 9

18. HOW DO I TELL THE COURT IF I DO NOT LIKE THE SETTLEMENT? 9

19. WHAT IS THE DIFFERENCE BETWEEN OBJECTING TO THE SETTLEMENT AND EXCLUDING MYSELF FROM THE SETTLEMENT?..... 10

The Court’s Fairness Hearing 10

20. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT? 10

21. DO I HAVE TO COME TO THE HEARING? 10

22. MAY I SPEAK AT THE HEARING? 11

Getting More Information 11

23. HOW DO I GET MORE INFORMATION?..... 11

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BASIC INFORMATION

1. WHAT IS THIS NOTICE AND LAWSUIT ABOUT?

The federal court overseeing this case authorized this Notice to inform you about a proposed class action settlement in a lawsuit known as *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR. The case is pending before the Honorable John A. Kronstadt in the United States District Court for the Central District of California.

Plaintiffs Tiffany Ecklor, Gaylynn Sanchez, Michael Nearing, and John Sancomb (together, the “Settlement Class Representatives”) allege that Mitsubishi designed and sold vehicles with a defective ZF-TRW ACU. The ACU is an electrical component that controls the functions of various safety features, including airbags. Plaintiffs allege the ZF-TRW ACUs in the Mitsubishi Class Vehicles (defined in **Question 2** below) are vulnerable to an electrical overstress condition that can cause the vehicles’ airbags and other passenger safety systems to malfunction during a collision, which may result in airbag non-deployment or other safety failures.

Mitsubishi denies all claims and allegations of wrongdoing in the lawsuit. The Court has not decided who is right. Instead, the Parties have agreed to the Settlement to avoid the costs, risk, and delays associated with continuing this complex and time-consuming litigation.

This Notice explains the litigation, the Settlement and your legal rights and options under it. If you have any questions, please visit www.ACUSettlement.com or contact the Settlement Notice and Claims Administrator at 1-855-680-6395 or info@ACUSettlement.com.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT

PARTICIPATE BY FILING A CLAIM	<p>To obtain cash compensation under this Settlement, you must submit a valid claim. Please refer to Question 6 for details on how to submit a valid claim.</p> <p>You can submit your claim now. Under the current schedule, claims must be submitted electronically or postmarked by May 8, 2026. This schedule may change, so please visit the Settlement Website (www.ACUSettlement.com) regularly for updates.</p>
REQUEST EXCLUSION	<p>If you wish to exclude yourself from the Settlement, you must submit a request to exclude yourself from, or “opt out” of, the Settlement, by February 27, 2025. If you do so, you will receive no cash payment under the Settlement, but you will preserve your rights to sue Mitsubishi over the claims being resolved by the Settlement. Please refer to Questions 13 for further details.</p>
OBJECT	<p>If you wish to object to the Settlement, you may write to the lawyers in this case and the Court, and explain what you dislike about the Settlement. You must submit your objection by February 27, 2025. If you object to the Settlement, you are expressing your views about the Settlement, but you will remain a member of the Class (if you are otherwise eligible) and you will still release the claims covered by the Settlement. If you make an objection, you must still submit a claim to receive compensation under the Settlement. Please refer to Questions 18 and 19 for further details.</p>

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YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT

	If you object to the Settlement as described above, you may ask to speak in Court about the fairness of the Settlement at the Fairness Hearing. Please refer to Questions 20-22 for further details.
DO NOTHING	If you do nothing, you will receive no payment in this Settlement and you will give up your right to sue or continue to sue Mitsubishi for the claims in this case.

WHO IS IN THE CLASS?

2. AM I PART OF THE CLASS?

The Class consists of all persons or entities who or which, on **November 1, 2024**, own or lease or previously owned or leased Mitsubishi Class Vehicles that were originally sold or leased in the United States or any of its territories or possessions.

To check whether you have a Mitsubishi Class Vehicle, please enter your Vehicle Identification Number (“VIN”) in the VIN lookup tool found at www.ACUSettlement.com.

If you do not know your VIN, please check the driver’s side dashboard and/or driver’s side door post, which will contain the 17-digit VIN for your vehicle. You should take a photo of the VIN with your phone, so you have easy access to the number when you’re filing a claim.

Eligibility for cash payments will be determined by VIN. The Mitsubishi Class Vehicles are the:

- 2013-2017 Mitsubishi Lancer;
- 2013-2015 Mitsubishi Lancer Evolution;
- 2013-2015 Mitsubishi Lancer Ralliart;
- 2013-2016 Mitsubishi Lancer Sportback; and
- 2013 Mitsubishi Outlander.

If you are not sure whether you are a Class Member, or have any other questions about the Settlement, visit www.ACUSettlement.com, or call toll-free at 1-855-680-6395.

3. IS ANYONE EXCLUDED FROM THE SETTLEMENT?

The following entities and individuals are excluded from the Settlement Class:

- Mitsubishi, its officers, directors, employees and outside counsel; its affiliates and affiliates’ officers, directors and employees; its distributors and distributors’ officers and directors; and Mitsubishi’s Dealers and their officers and directors;
- Settlement Class Counsel, Plaintiffs’ counsel, and their employees;
- Judicial officers and their immediate family members and associated court staff assigned to this case; and
- Persons or entities who or which timely and properly exclude themselves from the Class.

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SETTLEMENT BENEFITS – WHAT CLASS MEMBERS GET

4. WHAT DOES THE SETTLEMENT PROVIDE?

If approved, the Settlement will provide cash compensation and other benefits to Class Members. These benefits are:

1. A \$8,500,000 Settlement Fund to pay Class Members who submit a valid claim. **The cash payment will be up to \$250 per Mitsubishi Class Vehicle, with the potential for additional payments of unclaimed funds, depending on the volume of claims submitted and court-awarded fees and costs;** and
2. A robust Mitsubishi Class Vehicle inspection program.

Questions 5-9 below describe these benefits in more detail.

5. HOW MUCH CASH COMPENSATION WILL I RECEIVE IF I FILE A CLAIM?

After deducting attorneys' fees, costs, and Settlement Class Representative service awards (*see Question 17*) and Settlement administration costs (estimated at approximately \$447,000 to \$712,000), the remaining Settlement Amount will be allocated evenly, on a per-capita basis, among all Mitsubishi Class Vehicles for which the Settlement Notice and Claims Administrator has received a valid Claim Form. The compensation available will be up to \$250 per Mitsubishi Class Vehicle, with the potential for additional payments of unclaimed funds, depending on the volume of claims submitted.

If more than one Class Member submits a valid claim for the same Mitsubishi Class Vehicle, then the original owner who purchased that Mitsubishi Class Vehicle new shall receive 60% of the funds allocated to that Mitsubishi Class Vehicle, and the remaining 40% will be distributed evenly to or among the remaining Class Member(s) that submit a valid claim on that Mitsubishi Class Vehicle.

For example, if each Mitsubishi Class Vehicle is allocated \$250 and an original owner and a subsequent owner both submit valid claims for the same vehicle, the original owner would be allocated \$150, and the subsequent owner would be allocated \$100.

Class Members may submit one Claim Form for each Mitsubishi Class Vehicle they own(ed) or lease(d).

6. HOW DO I SUBMIT A CLAIM FOR CASH COMPENSATION?

You must timely submit a valid claim to receive a cash payment. The Claim Form asks for basic information and takes just a few minutes to complete.

To submit your claim online, visit www.ACUSettlement.com. If you received a Postcard or Email Notice and provide your Unique ID from that notice, you will not need to provide any documentation when you submit your claim. If you do not have a Unique ID, or if the Settlement Notice and Claims Administrator is unable to verify the information in your claim, the Settlement Notice and Claims Administrator may request supporting documentation to show your ownership or lease of the vehicle, such as vehicle title, registration, purchase agreement, lease agreement, insurance documentation, or other documentation showing both your name and the VIN.

If you would prefer to submit your Claim Form by mail, you can download and print the necessary forms from the Settlement Website or request a hardcopy form to be mailed to you by calling 1-855-680-6395 or sending an email to info@ACUSettlement.com. **For faster claims processing, you should submit your claim online at the website below, rather than by mail.**

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If you have questions about what documentation is needed for your claim, visit www.ACUSettlement.com or call the Settlement Notice and Claims Administrator at 1-855-680-6395.

Submit claims online: www.ACUSettlement.com

Submit claims via email: info@ACUSettlement.com

Submit claims via mail:

Mitsubishi Airbag Control Unit Settlement
c/o JND Legal Administration
PO Box 91000
Seattle, WA 98111

7. WHEN WILL I GET MY PAYMENT?

The Settlement Notice and Claims Administrator will calculate the payment amount for each timely, valid, and complete Claim Form, and send out payments after the Claim Period closes.

The Claims Period shall run as follows: Class Members shall have 12 months from the Effective Date to submit a Claim Form for cash compensation.

The “Effective Date” will depend on when the Court enters its order finally approving the Settlement and its Judgment, and whether there is an appeal of the Judgment.

Please check www.ACUSettlement.com after the Fairness Hearing (*see Question 20*) for information concerning the timing of cash payments. The Parties anticipate that the Court will hold its Fairness Hearing on **April 7, 2025** at 8:30 a.m.

8. HOW DOES THE SETTLEMENT INSPECTION PROGRAM WORK?

Once the Court grants final approval of the Settlement, Mitsubishi shall institute a Settlement Inspection Program to inspect Mitsubishi Class Vehicles when notified of a Qualifying Incident involving a Mitsubishi Class Vehicle. For more information, please review the Inspection Program Protocol that is attached as Exhibit 3 to the Settlement Agreement. The Settlement Agreement and its exhibits can be found at www.ACUSettlement.com.

9. WHAT HAPPENS TO ANY UNCLAIMED FUNDS IN THE SETTLEMENT?

The Settlement is non-reversionary. This means that no amount of the \$8.5 million will be returned to Mitsubishi. If there are any unclaimed funds remaining from the Settlement Amount the Parties will redistribute up to \$750 to all Class Members who submitted a valid claim, if economically feasible to do so.

If it is not feasible and/or economically reasonable to attempt a second distribution, then the remaining balance shall be distributed “*cy pres*,” which means they are paid to charitable causes that indirectly benefit the Class. The *cy pres* recipient(s) in this case, if any, is subject to the agreement of the Parties and Court approval. Please check www.ACUSettlement.com for updates about any *cy pres* distribution.

UNDERSTANDING THE CLASS ACTION PROCESS

10. WHAT IS A CLASS ACTION?

In a class action, one or more people called “class representatives” sue on behalf of other people who have similar claims. All these people are known as a “Class” or “Class Members.” When a class action

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is settled, the Court resolves the issues in the lawsuit for all Class Members, except for those who request to be excluded from (or “opt out” of) the Class. Opting out means that you will not receive benefits under the Settlement. The opt out process is described in **Questions 13** below.

11. WHAT AM I GIVING UP TO REMAIN A MEMBER OF THE CLASS?

If the Settlement becomes final and you do not exclude yourself, you will release Mitsubishi and the Released Parties from liability and will not be able to sue them about the issues in the lawsuit.

Under the Settlement, you are not releasing and are expressly reserving all rights relating to claims for personal injury, wrongful death, or actual physical property damage arising from an incident involving a Mitsubishi Class Vehicle, including the deployment or non-deployment of an airbag.

Section VII. of the Settlement Agreement describes the released claims in necessary legal terminology, so read it carefully. The Settlement Agreement is available at www.ACUSettlement.com.

You can talk to one of the lawyers listed in **Question 16** below for free or you can, of course, talk to your own lawyer at your own expense if you have questions about the released claims or what they mean.

12. WHAT HAPPENS IF I DO NOTHING AT ALL?

If you do nothing, you will not get a payment from the Settlement. *See Question 6* above for information on how to get a cash payment from the Settlement.

You will also be bound by all terms of the Settlement, which means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Mitsubishi about the legal issues in this case.

EXCLUDING YOURSELF FROM THE SETTLEMENT

13. HOW DO I GET OUT OF THE SETTLEMENT?

If you do not want to receive a cash payment from the Settlement and/or you want to retain the right to sue Mitsubishi about the legal issues in this case, then you must take steps to remove yourself from the Settlement. You may do this by asking to be excluded from the Settlement—sometimes referred to as “opting out.”

To opt out of the Settlement, you must mail or email a letter or other written document to the Settlement Notice and Claims Administrator. Your request must include:

- Your name, address, and telephone number;
- The VIN(s) and the dates of your ownership or lease of the Mitsubishi Class Vehicle(s);
- A statement saying “I wish to exclude myself from the Class in *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.); and
- Your handwritten, personal signature (electronic signatures, including DocuSign, are invalid and will not be considered personal signatures).

You cannot ask to be excluded over the phone or at the settlement website. You must mail your letter with your exclusion request postmarked no later than **February 27, 2025** to:

Mitsubishi Airbag Control Unit Settlement
c/o JND Legal Administration

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Questions? Visit www.ACUSettlement.com or call toll-free at 1-855-680-6395

PO Box 91000
Seattle, WA 98111

info@ACUSettlement.com

Your letter with your exclusion request must be postmarked no later than **February 27, 2025**, to be considered by the Court. The deadlines found in this notice may be changed by the Court. Please check www.ACUSettlement.com regularly for updates regarding the settlement.

14. IF I DO NOT EXCLUDE MYSELF, CAN I SUE THE DEFENDANTS FOR THE SAME THING LATER?

No. If you do not timely submit your request for exclusion or fail to include the required information in your request for exclusion, you will remain a Class Member and will not be able to sue Mitsubishi about the claims that the Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound like all other Class Members by the Court's orders and judgments in this class action lawsuit, even if you do not file a claim.

15. IF I EXCLUDE MYSELF, CAN I STILL GET A SETTLEMENT PAYMENT?

No. You will not get money from the Settlement if you exclude yourself. If you exclude yourself from the Settlement, do not send in a Claim Form asking for benefits from the Settlement.

THE LAWYERS REPRESENTING YOU

16. DO I HAVE A LAWYER IN THE CASE?

Yes. The Court has appointed lawyers from the law firms Baron & Budd, P.C. and Lieff Cabraser Heimann & Bernstein, LLP to represent you and other Class Members. These lawyers are called "Co-Lead Counsel." Their contact information is as follows:

Roland Tellis
Baron & Budd, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Tel.: (818) 839-2333
Email: rtellis@baronbudd.com

David S. Stellings
Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Tel.: (212) 355-9500
Email: dstellings@lchb.com

If you want to be represented by your own lawyer, you may hire one at your own expense.

17. HOW WILL THE LAWYERS BE PAID?

Co-Lead Counsel will ask the Court to award the attorneys representing the Class up to 30% percent of the Settlement Amount (i.e. up to \$2.55 million) to compensate them for their attorneys' fees and costs 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 4 proposed Settlement Class Representatives a service award of up to \$2,500 each for their work in this litigation.

The Court must approve Co-Lead Counsel's requests for fees, costs, and Settlement Class Representative service awards, before they are paid from the Settlement Fund. Co-Lead Counsel will submit their request by **January 27, 2025**, and that document will be available at www.ACUSettlement.com shortly

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after it is filed with the Court. Class Members will have an opportunity to comment on and/or object to the requests for attorneys' fees, costs and Settlement Class Representative service awards, as explained further in **Questions 18-19** below. Please check www.ACUSettlement.com regularly for updates regarding Class Counsel's request for attorneys' fees, costs, and Settlement Class Representative service awards.

OBJECTING TO THE SETTLEMENT

18. HOW DO I TELL THE COURT IF I DO NOT LIKE THE SETTLEMENT?

If you do not exclude yourself from the Settlement, you may object to it. The Court will consider your views in deciding whether to approve or reject the Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue.

To comment on or to object to the Settlement or to Co-Lead Counsel's request for attorneys' fees, costs, and Settlement Class Representative service awards, you or your attorney must deliver to Co-Lead Counsel and to Mitsubishi's Counsel, and file with the Court, on or before **February 27, 2025**, a written statement with the following information:

- The MDL case name (*In re ZF-TRW Airbag Control Units Products Liability Litigation*);
- Your name, actual address, and telephone number;
- The VIN(s) of your Mitsubishi Class Vehicle(s);
- The date(s) of purchase or lease of any Mitsubishi Class Vehicle(s);
- A written statement of your objections. Your objection must also state whether it applies only to you, to a specific subset of the Class, or to the entire Class, and state with specificity the grounds for the objection. The statement must also indicate whether you are represented by a lawyer in submitting your objection; and
- Your personal signature.

Any documents supporting your objection must also be attached to the objection.

If an objection is made through a lawyer, the objection must also include (in addition to the above items):

- The number of times the objector has objected to a class action settlement within the five years preceding the date that the objector files the objection;
- The caption of each case in which the objector has made such objection; and
- A statement of the nature of the objection.

The lawyer(s) asserting the objection must also:

- File a notice of appearance with the Court before the deadline to submit objections;
- File a sworn declaration attesting to his or her representation of each Class Member on whose behalf the objection is being filed, and specify the number of times during the prior five-year period that the lawyer or their law firm has objected to a class action settlement; and
- Comply with the written objection requirements described in Section VI.A. of the Settlement Agreement.

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You must deliver your written objection to Co-Lead Counsel and Mitsubishi’s Counsel, and file with the Court, on or before **February 27, 2025**.

CLERK OF THE COURT	CO-LEAD COUNSEL	MITSUBISHI’S COUNSEL
<p style="text-align: center;">Clerk of Court United States District Court Central District of California First Street Courthouse 350 W. First Street Courtroom 10B Los Angeles, CA 90012</p>	<p style="text-align: center;">Roland Tellis Baron & Budd, P.C. 15910 Ventura Boulevard, Suite 1600 Encino, CA 91436</p> <p style="text-align: center;">David S. Stellings Lieff Cabraser Heimann & Bernstein, LLP 250 Hudson Street, 8th Floor New York, NY 10013</p>	<p style="text-align: center;">Douglas W. Robinson Palmieri, Tyler, Wiener, Wilhelm & Waldron LLP 1900 Main Street, Suite 700 Irvine, CA 92614</p>

19. WHAT IS THE DIFFERENCE BETWEEN OBJECTING TO THE SETTLEMENT AND EXCLUDING MYSELF FROM THE SETTLEMENT?

Excluding yourself is telling the Court that you do not want to be part of the Class and do not want to receive any benefits under the Settlement or release any of the claims resolved by the Settlement. If you exclude yourself, you have no basis to object because the Settlement no longer affects you.

Objecting is telling the Court that you do not like something about the Settlement, the requested fees, costs, and/or Settlement Class Representative service awards. You may object only if you stay in the Class. You do not need to submit a claim to object, but if you object, you must still submit a claim to receive compensation under the Settlement.

THE COURT’S FAIRNESS HEARING

20. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT?

The Court will hold a Fairness Hearing on **April 7, 2025** at 8:30 a.m., at the United States District Courthouse, Central District of California, First Street Courthouse, 350 W. First Street, Courtroom 10B, Los Angeles, CA 90012. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, and whether to approve the request for attorneys’ fees, costs, and the request for Settlement Class Representative service awards. If there are objections, the Court will consider them and may listen to people who have asked to speak at the hearing (*see Question 22* below). The Court will decide whether to grant final approval of the settlement, and, if so, how much to pay the lawyers representing you and the Class. We do not know how long these decisions will take. The Court may reschedule the Fairness Hearing, so check the Settlement website for further updates.

21. DO I HAVE TO COME TO THE HEARING?

No, you do not need to attend the Fairness Hearing. Co-Lead Counsel will answer any questions the Court may have. If you wish to attend the hearing, you are welcome to come at your own expense. If you submit

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an objection to the Settlement, you do not have to come to Court to talk about it, but you have the option to do so if you provide advance notice of your intention to appear (*see* **Question 22** below). As long as you submitted a written objection with all of the required information on time with the Court, the Court will consider it. You may have your own lawyer attend at your expense, but it is not required.

22. MAY I SPEAK AT THE HEARING?

You or your attorney may ask the Court for permission to speak at the Fairness Hearing. To do so, you must file with the Court a written notice of your intent to appear by **March 17, 2025** and send a copy of that notice to Co-Lead Counsel and to Mitsubishi's Counsel at the addresses listed in **Question 18** above.

Anyone who has requested permission to speak must be present at the start of the Fairness hearing on **April 7, 2025** at 8:30 a.m. The Court may reschedule the Fairness Hearing, so check the Settlement website for further updates.

GETTING MORE INFORMATION

23. HOW DO I GET MORE INFORMATION?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement.

You can get a copy of the Settlement Agreement and other documents and information about the Settlement at www.ACUSettlement.com. You can also call the toll-free number, 1-855-680-6395 or write the Settlement Notice and Claims Administrator at:

Mitsubishi Airbag Control Unit Settlement
c/o JND Legal Administration
PO Box 91000
Seattle, WA 98111
info@ACUSettlement.com

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