

1
2 UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

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

Case No: 2:19-ml-02905-JAK-MRW

5 Affidavit of Patrick J. Hron

6
7 ALL ACTIONS AGAINST THE
8 HYUNDAI/KIA DEFENDANTS

9 STATE OF LOUISIANA)
10) : ss.
11 PARISH OF LAFAYETTE)

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13 1. I am an attorney at law and duly licensed to practice law in the State of Louisiana since
14 2012.

15 2. Except where noted, the testimony set forth in this declaration is based on my first-hand
16 knowledge, about which I would and could testify competently in Court if called upon to do so.¹

17 3. My curriculum vitae is attached hereto as Exhibit A, which accurately reflects my
18 significant experience as Special Master or Settlement Administrator, serving in a neutral capacity as
19 a mediator, and/or as otherwise working on and addressing settlements and related issues in other class
20 actions and mass torts.

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22 4. I began working on the BP Settlement Program, *In re: Oil Spill by the Oil Rig*
23 *"Deepwater Horizon"* – MDL 2179, overseen and administered by the late Patrick A. Juneau, in 2012.
24 I continued working on the Program under Mr. Juneau’s direction in a variety of roles, including as
25 internal counsel and in vendor management and oversight. In or around 2015, Mr. Juneau appointed
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27 _____
28 ¹ Capitalized terms used but not defined herein shall have the respective meanings given to them in the Settlement Agreement.

1 me as Appeals Coordinator to oversee the administration of the appellate processes set forth in the BP
2 Settlement. This position provided for unprecedented levels of review on individual claim
3 determinations, including by an independent panel appointed by United States District Judge Carl J.
4 Barbier, by Judge Barbier himself, and by the United States Court of Appeals for the Fifth Circuit.

5 5. Mr. Juneau asked me to join his firm, Juneau David, APLC, in 2018, at which point I
6 began working with him in other matters and on other cases. From that time and up until his passing,
7 I worked closely with Mr. Juneau on virtually every case in which he was appointed by a court, thereby
8 gaining experience and insight based on his decades of expertise on a variety of topics and matters.
9 Over this period, I worked with Mr. Juneau in cases involving distribution of billions of dollars in
10 settlement class funds to eligible class members, oversight and management of settlement vendors
11 aimed at maximizing fund distribution, construction and application of fair and equitable fund
12 allocation models, efficient management of mass litigation to assist courts with overloaded dockets
13 following catastrophic events, reports and recommendations to courts on setting class fund reserves
14 and attorneys' fees and costs, and multi-billion outreach programs designed to urge consumers to heed
15 vehicle safety recalls.

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18 6. Specifically, I have helped courts implement case management orders involving
19 oversight of thousands of lawsuits and resolution orders in several large, high-profile, complex and
20 multi-party federal and state mass and class action cases. I have also served as the mediator for over
21 four hundred cases. The mediated cases have involved both state and federal court actions.

22 7. Three examples of my experience in these types of cases are listed below.

- 23
24 • *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, U.S. District Court,
25 Central District of California – MDL 2905

26 I have been appointed as Settlement Special Administrator by this Court and charged with
27 administering the Toyota Settlement stemming from this same MDL, including but not limited
28 to review and determination of out-of-pocket expense reimbursement claims, the effectuation

1 of a Residual Distribution, and the oversight of a comprehensive Outreach Program to increase
2 Recall participation in Toyota Subject Vehicles.

- 3 • *In Re: Takata Airbag Products Liability Litigation*, U.S. District Court, Southern District
4 of Florida – MDL 2599

5 I have been appointed as Settlement Special Administrator with the late Patrick A. Juneau for
6 the implementation of eight separate settlement agreements, with funds totaling nearly \$2.0
7 billion. I helped develop processes to efficiently process several million claims in aggregate for
8 out-of-pocket expense reimbursement related to performing the Takata safety recall and for
9 distribution of remaining funds at program-end.

- 11 • *In Re: Hurricane Laura and Hurricane Delta*, U.S. District Court, Western District of
12 Louisiana

13 I have been appointed as Special Master in this unconsolidated litigation involving several
14 thousand first-party homeowner and business interruption insurance lawsuits throughout
15 Louisiana following Hurricanes Laura and Delta, the vast majority of which were filed in a
16 single division of the Court before The Honorable James D. Cain. Alongside the late Patrick
17 A. Juneau, I implemented the Court’s Case Management Order mandating the streamlined
18 mediation of over 7,500 insurance lawsuits, with 98% of cases moved through the Court-
19 ordered mediation process within two years of the prescriptive deadline.

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22 8. If the Settlement Agreement is finally approved and attains its Effective Date, as
23 Settlement Special Administrator, I will perform the requirements assigned to me as further discussed
24 in the Settlement Agreement.

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26 9. As the Settlement Special Administrator, I may be consulted regarding additional
27 outreach and notice costs that the Parties jointly agree is necessary in furtherance of the terms of this
28 Settlement Agreement.

1 10. In light of all of the activities identified above, including, but not limited to, the review,
2 assessment, processing, rejection in whole or in part, approval in whole or in part, further review and
3 determinations of potentially cured claims, coordination with the Settlement Notice Administrator,
4 meeting-and-conferring with the Parties, determination of relief to eligible Claimants, approval of
5 disbursement of funds to eligible Claimants, and related claims processing activities, I currently
6 estimate, based on my experience and reasonable assumptions for this settlement albeit with limited
7 foresight at this time about the total volume of claims that will be received and will require assessment,
8 that my fees and costs over the 18-month administration of the settlement could range from \$200,000
9 to \$400,000.
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11 11. I welcome the opportunity to appear before the Court and answer any questions that the
12 Court has.
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14 I state, under penalty of perjury under the laws of the United States of America, that the above
15 statements are true and correct, and that this affidavit was executed on March 13, 2025.
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18 PATRICK J. HRON
19 SETTLEMENT SPECIAL ADMINISTRATOR
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