

**UPDATED EXHIBIT 2 TO
SETTLEMENT AGREEMENT WITH
BMW DEFENDANTS**

Current and former owners and lessees of certain BMW vehicles with a Takata airbag may be entitled to a payment from a class action settlement.

Si desea recibir esta notificación en español, llámenos o visite nuestra página web.

A \$131 million Settlement has been reached in a class action lawsuit alleging that BMW of North America, LLC and its affiliates (“BMW”) manufactured and sold vehicles that contained allegedly defective airbags made by Takata Corporation and its affiliates (“Takata”). BMW denies the allegations in the lawsuit, and the Court has not decided who is right. The \$131 million Settlement Amount, less a 10% credit for the Rental Car/Loaner Program, will be funded over a period of time and will be used for all relief and associated costs, as further discussed in the Settlement Agreement. **The purpose of this notice is to inform you of the class action and the proposed settlement so that you may decide what to do.**

Who’s Included? BMW’s records indicate that you may be a Class Member. The Settlement offers potential payments and other benefits to owners and lessees of certain BMW vehicles that have or had Takata airbags, which are, may or will be subject to a Recall (“Subject Vehicles”). A complete list of Subject Vehicles currently included in the Settlement is posted on the www.XXXXXXXXXXXXXXXXXX.com Settlement Website. This Settlement does not involve claims of personal injury or property damage to any property other than the Subject Vehicles.

What Are the Settlement Terms? The Settlement offers several benefits, including reimbursement of reasonable out-of-pocket expenses related to the Takata airbag recall, a Rental Car/Loaner Program for owners or lessees of certain Subject Vehicles, an Outreach Program to maximize completion of the recall remedy, additional payments to Class Members from residual Settlement funds, if any remain, up to a maximum of \$500, and a Customer Support Program to help with repairs associated with affected Takata airbag replacement inflators. For further details about the Settlement, including the relief, eligibility, and release of claims, you can review the Settlement Agreement at the website, [website].

How Can I Get a Payment? You must file a Claim to receive a payment during the first four years of the Settlement. Visit the website and file a Claim online or you can download one and file by mail. The deadline to file a Claim will depend on the recall or repair date of your Subject Vehicle and will be at least one year from the date the Settlement is finalized. All deadlines will be posted on the website when they are known.

Your Other Options. If you do not want to be legally bound by the Settlement, you must exclude yourself by **Month DD, 2017**. If you do not exclude yourself, you will release any claims you may have against BMW and the Released Parties and receive certain settlement benefits, as more fully described in the Settlement Agreement, available at the Settlement Website. You may object to the Settlement by **Month DD, 2017**. You cannot both exclude yourself from, and object to, the Settlement. The Long Form Notice available on the website listed below explains how to exclude yourself or object. The Court will hold a hearing on **Month DD, 2017** to consider whether to finally approve the Settlement and a request for attorneys’ fees of up to 30% of the Settlement Amount and awards of \$5,000 to each of the Class Representatives. You may appear at the hearing, either yourself or through an attorney hired by you, but you don’t have to. For more information, call or visit the website below.

Settlement Notice Administrator for

In re Takata Airbag Products Liability

Litigation (Economic Loss Actions), (S.D. Fla.)

[Address]

[City, State ZIP Code]

**Important Legal Notice from the United States
District Court for the Southern District of Florida.**

This is a notice of a class action settlement. **If you have received a separate recall notice for your BMW vehicle requesting that you bring it to your local retailer to have the Takata airbags repaired and have not yet done so, you should contact your local retailer to make an appointment for this repair as soon as possible.** Some vehicles will be recalled for repair at a later date and some vehicles may not be recalled (refer to NHTSA website safercar.gov for the schedule and vehicles involved). Please call the toll free number or access the website noted below if you have any questions. **When recalled Takata airbags deploy, they may spray metal debris toward vehicle occupants and may cause serious injury.**