

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

**MDL No. 2599
Master File No.: 15-MD-02599-MORENO
S.D. Fla. Case No. 1:14-cv-24009-MORENO**

**IN RE: TAKATA AIRBAG PRODUCT
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

**ECONOMIC LOSS TRACK CASES
AGAINST TOYOTA, BMW, MAZDA, AND
SUBARU DEFENDANTS**

**NOTICE OF FILING OF UPDATED EXHIBITS 2 AND 11 TO THE
SETTLEMENT AGREEMENTS WITH THE
TOYOTA, BMW, MAZDA AND SUBARU DEFENDANTS**

On May 18, 2017, Plaintiffs electronically filed the Settlement Agreements and accompanying exhibits involving the Toyota, BMW, Mazda, and Subaru Defendants (the “Settling Defendants”) (ECF Nos. 1724-1, 1724-2, 1724-3, 1724-4).

Plaintiffs and the Settling Defendants subsequently made minor revisions to Exhibit 2 to the Settlement Agreements (Direct Mail Notice) and developed mock-ups of how the notices that will be mailed to Class Members will appear as printed. The updated mock-ups of Exhibit 2 are attached to this Notice.

In addition, Plaintiffs and the Settling Defendants agreed to print the updated notices on 8.5” x 5” oversized flat cards, instead of 5.5” x 4.25” standard sized postcards, which will better accommodate the text of the notices and provide the added benefit of making the notices even more conspicuous. To account for the printing and postage costs associated with using the larger format, the proposed Settlement Notice Administrator updated the expected budget for the

Notice Plan. This updated budget for the Notice Plan is reflected in the declaration attached hereto, which is an amendment to the declaration found at Exhibit 11 to the Settlement Agreements.

Dated: June 8, 2017

Respectfully submitted,

PODHURST ORSECK, P.A.

/s/ Peter Prieto

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 8, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

By: /s/ Peter Prieto
Peter Prieto