

**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 HONDA DEFENDANTS**

**NOTICE OF FILING STIPULATION AND UPDATED EXHIBITS 6, 9, AND 12 TO THE
SETTLEMENT AGREEMENT WITH THE HONDA DEFENDANTS**

On September 1, 2017, Plaintiffs filed the Settlement Agreement between Plaintiffs and the Honda Defendants (ECF No. 2013-1). The Court granted preliminary approval of the Settlement Agreement on September 19, 2017, which authorized the Parties to implement the Notice Plan set forth in the Settlement Agreement (ECF No. 2043). In the process of compiling lists of Vehicle Identification Numbers for the purpose of preparing and sending direct mail notice to potential Class Members, the Parties discovered that one model year of one type of vehicle was inadvertently omitted from Exhibit 9, and another model of vehicle was inadvertently included. The Parties have agreed to amend the relevant Exhibits to the Settlement Agreement, including Exhibits 6, 9, and 12, to reflect the correct list of Subject Vehicles and avoid any potential confusion. In addition, the Parties have agreed to amend and modify provisions of the Settlement Agreement, as well as Exhibit 6, concerning the duration of the Customer Support Program to provide greater benefits to the Settlement Class and make the

Customer Support Program more administratively feasible. A stipulation reflecting this agreement and the amended Exhibits are attached to this notice.

Dated: November 5, 2017

Respectfully submitted,

PODHURST ORSECK, P.A.

/s/ Peter Prieto

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via CM/ECF and served on all counsel of record via electronic notices generated by CM/ECF on November 5, 2017.

By: /s/ Peter Prieto
Peter Prieto