

**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 NISSAN DEFENDANTS**

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

On August 8, 2017, Plaintiffs filed the Settlement Agreement between Plaintiffs and the Nissan Defendants (ECF No. 1971-1). 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. 2042). 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 four model years of vehicles originally included in Exhibit 9 to the Settlement Agreement were not equipped with original equipment Takata phase-stabilized ammonium-nitrate inflators, and thus should not have been included in Exhibit 9 because they did not meet the definition of Subject Vehicles. 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. A stipulation reflecting this agreement and the amended Exhibits are attached to this notice.

Dated: November 1, 2017

Respectfully submitted,

PODHURST ORSECK, P.A.

/s/ Peter Prieto

Peter Prieto (FBN 501492)
Aaron S. Podhurst (FBN 63606)
Stephen F. Rosenthal (FBN 131458)
John Gravante (FBN 617113)
Matthew P. Weinshall (FBN 84783)
Alissa Del Riego (FBN 99742)
SunTrust International Center
One S.E. Third Ave., Suite 2700
Miami, Florida 33131
Phone: (305) 358-2800
Fax: (305) 358-2382
Email: pprieto@podhurst.com
apodhurst@podhurst.com
srosenthal@podhurst.com
jgravante@podhurst.com
mweinshall@podhurst.com
adelriego@podhurst.com

Chair Lead Counsel for Plaintiffs

<p>COLSON HICKS EIDSON Lewis S. "Mike" Eidson mike@colson.com Curtis Bradley Miner curt@colson.com 255 Alhambra Circle, PH Coral Gables, FL 33134 T: 305-476-7400</p> <p><i>Plaintiffs' Personal Injury Track Lead Counsel</i></p>	<p>POWER ROGERS & SMITH, P.C. Todd A. Smith tsmith@prslaw.com 70 West Madison St., 55th Floor Chicago, IL 60602 T: (312) 236-9381</p> <p><i>Plaintiffs' Economic Damages Track Co-Lead Counsel</i></p>
<p>BOIES, SCHILLER & FLEXNER LLP David Boies, Esq. Motty Shulman (Fla Bar. No. 175056) 333 Main Street Armonk, NY 10504 Tel: (914) 749-8200 Fax: (914) 749-8300 Email: dboies@bsflp.com mshulman@bsflp.com</p> <p>Stephen N. Zack (Fla. Bar No. 145215) Mark J. Heise (Fla. Bar No. 771090) 100 Southeast 2nd Street, Suite 2800 Miami, FL 33131 Tel: (305) 539-8400 Fax: (305) 539-1307 Email: szack@bsflp.com mheise@bsflp.com</p> <p>Richard B. Drubel Jonathan R. Voegele 26 South Main Street Hanover, NH 03755 Tel: (603) 643-9090 Fax: (603) 643-9010 Email: rdrubel@bsflp.com jvoegele@bsflp.com</p> <p><i>Plaintiffs' Economic Damages Track Co-Lead Counsel</i></p>	<p>LIEFF CABRASER HEIMANN & BERNSTEIN LLP Elizabeth Cabraser ecabraser@lchb.com Phong-Chau Gia Nguyen pgnguyen@lchb.com 275 Battery St., Suite 3000 San Francisco, CA 94111-3339 T: 415-956-1000</p> <p>David Stellings 250 Hudson Street, 8th Floor New York, NY 10012 212-355-9500 dstellings@lchb.com</p> <p><i>Plaintiffs' Steering Committee</i></p>

<p>CARELLA BYRNE CECCHI OLSTEIN BRODY & AGNELLO, PC James E. Cecchi jcecchi@carellabyrne.com 5 Becker Farm Road Roseland, NJ 07068-1739 T: 973 994-1700 f: 973 99 4-1744</p> <p><i>Plaintiffs' Steering Committee</i></p>	<p>BARON & BUDD, PC Roland Tellis rtellis@baronbudd.com David Fernandes dfernandes@bardonbudd.com Mark Pifko mpifko@baronbudd.com 15910 Ventura Blvd., Suite 1600 Encino, CA 91436 T: 818-839-2333</p> <p>J. Burton LeBlanc 9015 Bluebonnet Blvd. Baton Rouge, LA 70810 T: 225-761-6463</p> <p><i>Plaintiffs' Steering Committee</i></p>
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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 1, 2017.

By: /s/ Peter Prieto
Peter Prieto