

EXHIBIT A

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

**IN RE: TAKATA AIRBAG PRODUCTS
LIABILITY LITIGATION,**

**MDL NO. 2599
Case No. 1:15-md-02599-FAM**

SUPPLEMENTAL DECLARATION OF CAMERON R. AZARI, ESQ.

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice and I have served as an expert in dozens of federal and state cases involving class action notice plans.

3. I am the Director of Legal Notice for Hilsoft Notifications (“Hilsoft”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans. Hilsoft is a business unit of Epiq Systems Class Action and Claims Solutions (“Epiq”).

4. On November 2, 2018, I executed my *Declaration of Cameron R. Azari, Esq., on Implementation and Adequacy of Class Notice Program* (“*Implementation Declaration*”) in which I detailed the successful implementation of the Notice Plan and provided current statistics on administration activity. Previously on July 16, 2018, I executed my *Declaration of Cameron R. Azari, Esq. on Proposed Ford Settlement Class Notice Program,*” in which I detailed Hilsoft’s

class action notice experience and attached Hilsoft's *curriculum vitae*. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice programs.

5. This declaration provides updated information on the notice and administration activity to date, including the Direct Mail Notice, case website, toll-free number and timely exclusions received. The facts in this declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues from Hilsoft and Epiq, who worked with us to implement the notification effort.

Individual Notice

6. As reported in my *Implementation Declaration*, the Direct Mail Notice effort resulted in 8,030,191 total Direct Mail Notices sent to Ford Class Members.

7. The return address on the Notices is a post office box maintained by Epiq. As of December 3, 2018, Epiq has re-mailed 13,778 Direct Mail Notices for addresses that were corrected through the USPS. For Direct Mail Notices that were returned as undeliverable, Epiq undertook additional public record research, using a third-party lookup service ("ALLFIND", maintained by LexisNexis), which as of December 3, 2018, has resulted in the re-mailing of 296,028 Direct Mail Notices.

Case Website

8. The neutral, informational website (www.AutoAirbagSettlement.com) in both English and Spanish established for the Takata Settlements continues to be available. The website is configured with a homepage with basic information about the lawsuit and the settlements. Prominent buttons are shown that link to more detailed information on each settlement. Also on

the homepage are prominent links that allow Class Members to easily begin filing a claim and to do a quick check to see if their vehicle VIN is included in the Settlements.

9. At each OEM-specific page, Class Members can review documents including the Long Form Notice, Settlement Agreement, Preliminary Approval Order, list of Subject Vehicles and many other relevant documents. Each OEM page includes a summary of all relevant dates and deadlines and answers to frequently asked questions. Visitors to each OEM page have the option to view the page in either English or Spanish. Class Members who wish to file a claim online can do so easily via a link on each OEM page (in addition to the link on the main homepage). Or, if they choose, Class Members are able to download and print a physical claim form for filing via mail. The case website is constantly updated as needed and will remain open for as long as the Court directs.

10. For all seven OEMS, including Ford, as of December 3, 2018, there have been 4,431,840 visits, represented by 3,377,166 unique users to the case website and over 22,965,647 website pages presented.

Toll-free Telephone Number, Postal Mailing Address and Email Address

11. The toll-free phone number (1-888-735-5596) established (in both English and Spanish) for the Takata Settlements, continues to be available 24 hours per day, 7 days per week. For all seven OEMs, including Ford, as of December 3, 2018, the toll-free number has handled 494,681 calls representing 3,070,044.37 minutes of use and live operators have handled 170,524 incoming calls representing 1,271,601.57 minutes of use. Live operators have also made 11,329 outbound calls representing 24,545.47 minutes of use.

12. As of December 3, 2018, the post office box and an email inbox established for the Settlements for Class Members to contact the claims administrator have received 5,835 pieces of correspondence and 43,900 emails have been received.

Internet Sponsored Search Listings

13. To facilitate locating the case website, sponsored search listings were acquired on the three most highly-visited internet search engines: *Google*, *Yahoo!* and *Bing*. When search engine visitors searched on common keyword combinations, such as “Airbag Class Action,” “Takata Airbag Lawsuit,” and “Ford Airbag Class Action,” the sponsored search listing was displayed at the top of the page prior to the search results or in the upper right hand column.

14. The sponsored listings were displayed until the Exclusion and Objection deadline passed on November 26, 2018. In total the sponsored listings were displayed 112,320 times, resulting in 28,246 clicks that displayed the case website.

Exclusion Requests


15. The exclusion deadline was November 26, 2018. As of December 3, 2018, ECA has received a total of 4,311 requests for exclusion from the Ford Settlement Class Members. Because the November 26th deadline is a postmark deadline, some additional exclusion requests are still likely to be received. A copy of the final Exclusion Report for Ford will be provided to the Parties for filing with the Court prior to the December 11, 2018 Final Approval Hearing.

CONCLUSION

16. As reported in my *Implementation Declaration*, the Notice Program provided the best notice practicable under the circumstances of this case, conformed to all aspects of Federal Rule of Civil Procedure 23, and comported with the guidance for effective notice articulated in

the Manual for Complex Litigation 4th. With the combination of Direct Mail Notice to all identified Class Members and the extensive media notice effort, the Notice Plan effectively reached more than 95% of the Settlement Class Members.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 4, 2018.



Cameron R. Azari, Esq.

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